

DONALD R. VAN DER VAART

Secretary

SHEILA C. HOLMAN

Director

XXXX, 2016

Ms. Debbie Tadlock Mill Manager Weyerhaeuser NR Company 524 Pride Way Elkin, North Carolina 28621

SUBJECT: Air Quality Permit No. 05678T44

Facility ID: 8600108

Weyerhaeuser NR Company - Elkin Facility

Elkin, North Carolina

Surry County Fee Class: Title V PSD Status: Major

Dear Ms. Tadlock:

In accordance with your completed Air Quality Permit Applications for a TV permit renewal and a 15A NCAC 02Q .0501(c)(2) Part II significant modification of a Title V permit received July 1, 2016 and August 8, 2016, respectively, we are forwarding herewith Air Quality Permit No. 05678T44 to Weyerhaeuser NR Company - Elkin Facility, 524 Pride Way, Elkin, North Carolina authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been listed for informational purposes as an "ATTACHMENT." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the conditions of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with both the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon

Ms. Tadlock XXXX, 2016 Page 2

receipt of the request for a hearing. Unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Surry County has been triggered for increment tracking under PSD for sulfur dioxide (SO₂), PM₁₀ and nitrogen oxides (NO_x). The 501(c)(2) Part I significant modification issued on October 2, 2015 resulted in an increase of PM₁₀, SO₂ and NOx emissions less than 1 pound per hour each. No changes in actual emissions of these pollutants are associated with the TV permit renewal or the 501(c)(2) Part II significant modification.

This Air Quality Permit shall be effective from XXXX, 2016 until XXXX, 2021, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein. Should you have any questions concerning this matter, please contact Betty Gatano, P.E., at (919) 707-8736 or betty.gatano @ncdenr.gov.

Sincerely yours,

William D. Willets, P.E., Chief, Permitting Section Division of Air Quality, NCDEQ

Enclosure

cc: Heather Ceron, EPA Region 4
Winston-Salem Regional Office
Central Files
Connie Horne (cover letter only)

ATTACHMENT to Air Permit No. 05678T44

Insignificant Activities per 15A NCAC 02Q .0503(8)

Emission Source Id. No.	Emission Source Description	
I-SHT	Sawdust handling and transport	
I-SS	Sawdust storage	
IEWH	Electric Woodyard Hog	
I-WHFHO	Wet hog fuel handling operations	
I-WHFSO	Wet hog fuel storage operations	
I-HIBDO	Hog infeed bypass dump operation	
I-MSO	Mulch system operation	
I-WFHO	Wet fuel hogging operation	
I-BP	Bark pile	
I-WFS	Wet fuel silo	
I-DWS	Dry waste silo	
I-SDS	Sander dust silo	
I-DWHB	Dry waste handling bin	
I-TGFB	Three green flake bins	
I-PBV	Press Building Vents	
I-CT-1	Cooling Tower No.1	
I-CT-2	Cooling Tower No.2	
I-WCAD	Wet cell ash dump	
I-PWO	Post wet operations	
I-SO	Stencil operations	
I-SFTL	Sanderdust/dry fines truck loading	
I-PTL	Peerless truck loading	
I-SWSP	Storm water settling pond	
I-2900-300 (MACT Subpart DDDD)	Touch-up Paint Booth	
I-2911-100 (MACT Subpart DDDD)	Multi-size Autospray Edgeseal Unit	
I-STAMP	Two (2) Board-grade Stamping Operations	
I-FRB	Flake Reclaim Bin	
I-FL-RE	Flake Recovery System	
I-MMA	Miscellaneous Maintenance Activities Including Parts Washers	
I-PST	Propane Storage Tanks < 1,450 gallon capacity each	
I-GST	Gasoline Storage Tank, 280 gallon capacity	
I-4030-100	Diesel fuel storage tank - 75,000 gallons capacity	
I-4011-100	Resin Storage Tank - 20,758 gallons capacity	
I-4012-100	Resin Storage Tank - 20,758 gallons capacity	
I-4050-100	Wax Storage Tank - 20,758 gallons capacity	
I-WTS	Wastewater Treatment System	
I-HOST	Two hydraulic oil storage tanks, one in Finishing & one in the Woodroom-380 gallon each	
I-UOS	Four used oil storage tanks used through the mill- 260 gallons each	

- 1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the Permittee is exempted from demonstrating compliance with any applicable requirement.
- 2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 "Control of Toxic Air Pollutants" or 02Q .0711 "Emission Rates Requiring a Permit."
- 3. For additional information regarding the applicability of MACT or GACT see the DAQ page titled "Specific Permit Conditions Regulatory Guide." The link to this site is as follows: http://deq.nc.gov/about/divisions/air-quality/air-quality-permits/specific-permit-conditions-regulatory-guide

Summary of Changes to Permit

The following changes were made to the Weyerhaeuser NR Company - Elkin Facility, Air Permit No. 05678T43:

Prev	ious Permit	Ne	w Permit	Description of Changes
Page No.	Section	Page No.	Section	
Cover and throughout		Cover and throughout		Updated all dates and permit revision numbers.
	Insignificant Activities List		Insignificant Activities List	 Updated footnotes. Updated the hydraulic oil storage tanks by adding a tank in the finishing operations and one in the woodroom, 380 gallons each (ID No. I-HOST). Four used oil storage tanks used through the mill-260 gallons each (ID No. I-UOS).
	Table of Contents		Table of Contents	Added Section 2.3, Permit Shield for Non-Applicable Requirements.
3 – 5	1.0 – Equipment List	3 – 5	1.0 – Equipment List	 Replaced "fuel oil" with "No. 2 fuel oil" in emission source descriptions for drum dryers, suspension burners, and wet cells in the table and throughout the permit. Changed the name of the "Alternative Operating Mode" of the wet cells (ID Nos. 3311, 3321, and 3331) to "Dryer Bypass Mode" in table and throughout permit. Removed debarking unit (ID No. 1134). Removed asterisks and associated footnote indicating control devices (ID Nos. 2821-401 and 2821-301) are listed as a minor modification per 15A NCAC 02Q .0515 Removed asterisks and associated footnote requiring the Permittee to submit a Title V Air Quality Permit Application on or before 12 months after commencing operation of the OSB Press (ID No. 4301). Submittal of Air Permit No. 8600108.16B on August 8, 2016 fulfilled this requirement.
	2.1		2.1	Changed "condition" references (e.g., "condition a") to "Section" references (e.g. "Section 2.1 A.3.a") throughout Section 2.1.
6	2.1 A Equipment List	6	2.1 A Equipment List	Added control devices for the emission sources subject to requirements in Section 2.1 A.
6 – 8	2.1 A. – Regulations Table	7 – 8	2.1 A. – Regulations Table	 Added both equations under 15A NCAC 02D .0515, as specified in the body of the permit. Added reference to 15A NCAC 02Q .0508(j) for recordkeeping when changing operating scenarios. Specified the limits under BACT, rather than only citing the section reference. Reordered the references so they follow the order in the permit. Removed reference to 15A NCAC 02Q .0317 for PSD avoidance under Section 2.2.E.1. This is an incorrect reference, as it should be 02D .0530(u). Also, the requirement for tracking the projected actual emission has been fulfilled, and the permit condition is no longer necessary.

Prev	rious Permit	Ne	w Permit	Description of Changes	
Page No.	Section	Page No.	Section		
9	2.1 A.2.c			 Removed extraneous statement regarding testing under 15A NCAC 02D .0530. Renumbered permit condition accordingly. 	
9	2.1 A.2.d	9	2.1 A.2.c	Clarified language regarding monitoring, recordkeeping, and reporting.	
10	2.1 A.3.c			 Removed extraneous statement regarding testing under 15A NCAC 02D .0530. Renumbered permit condition accordingly. 	
10	2.1 A.3.d	10	2.1 A.3.c	Clarified language regarding monitoring, recordkeeping, and reporting.	
11	2.1 A.5.c	11	2.1 A.5.c	Clarified language regarding monitoring, recordkeeping, and reporting.	
14	2.1 A.7.e	14	2.1 A.7.e	Modified the requirement to submit results of maintenance performed on emissions sources within 30 days rather than 60 days of a written request by the DAQ. Thirty days is the standard requirement for such submittals.	
14 – 15	2.1 A.7.g, h. and i	14	2.1 A.7.g, h. and i	Reformatted and updated testing language for 15A NCAC 02D .0530.	
15	2.1 A.7.k	15	2.1 A.7.k	Reformatted and updated monitoring language for 15A NCAC 02D .0530.	
17	2.1 A.7.r	16	2.1 A.7.r	Modified the requirement to submit results of maintenance performed on control devices within 30 days rather than 60 days of a written request by the DAQ. Thirty days is the standard requirement for such submittals.	
17	2.1 A.7.u	16	2.1 A.7.u	Removed language for establishing "normal" visible emission for the wet cells. These emission sources have been in operation for more than 30 days.	
18	2.1 A.9.b	17	2.1 A.8.b	Specified that the five years of required recordkeeping under 15A NCAC 02D .0530(u) ends in 2016.	
18	2.1 A.9.c	17	2.1 A.8.c	Specified that the final report under 15A NCAC 02D .0530(u) is due on or before March 1, 2017.	
19	2.1 A.10.a	17 – 18	2.1 A.9.a	Listed the emission sources and control devices in the Primary Operating Mode subject to 15A NCAC 02D .0614, Compliance Assurance Monitoring.	
40 – 41	2.2 B	20	2.A.11	 Moved the PSD avoidance condition from Section 2.2 B to section 2.1 A.11 because this condition applies only to the emission sources listed in Section 2.1 A. Renumbered permit accordingly 	
40	2.2 B.1.b	21	2.2 A.11.b	 Added a statement that the VOC monthly calculations must be recorded in a logbook. Added a statement that the Permittee must attached the approval memorandum to the permit upon receipt of an approved test that demonstrates different operating temperature of the RTO. 	
18	2.1 A.8	22	2.1 A.12	 Corrected reference for alternative operating scenarios to 15A NCAC 02Q .0508(j). Moved the permit condition to correspond to the order of the 15A NCAC regulations. 	

Prev	ious Permit	Ne	w Permit	Description of Changes
Page No.	Section	Page No.	Section	
22	2.1 B – Regulations Table	22	2.1 B – Regulations Table	 Added reference to 15A NCAC 02D .0515. Removed reference to recordkeeping and reporting under 15A NCAC 02D .0530(u) found in Section 2.2.E.1. These requirements have been fulfilled. Removed reference to 15A NCAC 02Q .0501/.0504. This requirement was met with
				the submittal of Permit Application No. 8600108.16B.
25	2.1 B.3	22 - 23	2.1 B.1	Moved the permit condition to correspond to the order of the 15A NCAC regulations.
25	2.1 B.3.c	23	2.1 B.1.c	 Clarified language regarding monitoring, recordkeeping, and reporting. Deleted reporting requirement and combined the requirements under 2.1 B.1.c.
23	2.1 B.1.c	23	2.1 B.2.c	Clarified language regarding monitoring, recordkeeping, and reporting.
24	2.1 B.2.g	24	2.1 B.3.g	Updated permit condition for visible emission observations to standard permitting language.
25	2.1 B.2.k	25	2.1 B.3.k	Reformatted reporting permit condition.
26	2.1 B.5			Removed permit condition for submittal of a permit application under 15A NCAC 02Q .0501/.0504. This requirement was met with the submittal of Permit Application No. 8600108.16B.
28	2.1 C.1.b	26	2.1 C.1.b	Clarified language regarding monitoring, recordkeeping, and reporting.
28	2.1 C.2.c	27	2.1 C.2.c	Clarified language regarding monitoring, recordkeeping, and reporting.
29	2.1 C.3.d through	28	2.1 C.3.d and e	 Consolidated inspection, maintenance, and recordkeeping requirements for the cyclones and the bagfilters. Renumbered the remaining conditions accordingly.
30	2.1 C.3.h	28	2.1 C.3.f	Modified the requirement to submit results of maintenance performed on control devices within 30 days rather than 60 days of a written request by the DAQ. Thirty days is the standard requirement for such submittals.
30	2.1 C.3.k	28	2.1 C.3.i	Updated permit condition for visible emission observations to standard permitting language.
34	2.1 D.3.d	31	2.1 D.3.c	Moved noncompliance statement from reporting requirement to monitoring and recordkeeping requirements.
34	2.1 D.3.d	31	2.1 D.3.d	Clarified and reformatted the reporting requirements.
35	2.1 D.4.a	32	2.1 D.4.a	Updated applicability statement for 40 CFR 63, Subpart ZZZZ "NESHAP for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" for engines (ID No. 4763- 100).
35	2.1 D.5	32 – 34	2.1 D.5	Updated entire permit condition for 40 CFR 63, Subpart ZZZZ "NESHAP for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" for engines (ID Nos. 5000- 100 and TOSEG).

Previ	ious Permit	Ne	w Permit	Description of Changes
Page No.	Section	Page No.	Section	
38	2.1 E	35	2.1 E	Removed debarking unit (ID No. 1134) throughout permit condition.
	2.2		2.2	Changed "condition" references (e.g., "condition a") to "Section" references (e.g. "Section 2.2 A.1.a") throughout Section 2.2.
40	2.2 A.1.g.i.(A)	36	2.2 A.1.g	Moved requirement to calculate SO2 emissions to recordkeeping requirements under Section 2.2 A.1.g.
43	2.2 C.1.m	39	2.2 B.1.n	Added a statement that the Permittee must attached the approval memorandum to the permit upon receipt of an approved test that demonstrates different operating temperature of the RTO.
43	2.2 C.1.n.iii	39	2.2 B.1.o.iii	Added a statement that the Permittee must attached the approval memorandum to the permit upon receipt of an approved test that demonstrates different minimum and/or maximum biofilter bed temperatures.
51	2.2.E			Removed permit condition for tracking projected actual emissions under 15A NCAC 02D .0530(u). This requirement has been fulfilled
		46	2.3	Added Section 2.3, Permit Shield for Non- Applicable Requirements, for applicability of the Wet Cells to MACT Subpart DDDDD.
52 – 61	3.0	47 – 56	3.0	Updated General Conditions and List of Acronyms with most current version (Version 4.0 12/17/2015)



State of North Carolina Department of Environmental Quality Division of Air Quality

AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
05678T44	05678T43	XXXXX, 2016	XXXX, 2021

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

Permittee: Weyerhaeuser NR Company Elkin Facility

Facility ID: 8600108

Facility Site Location: 524 Pride Way

City, County, State, Zip: Elkin, Surry County, North Carolina 28621

Mailing Address: 524 Pride Way

City, State, Zip: Elkin, North Carolina 28621

Application Number: 8600108.16A and 8600108.16B Complete Application Date: July 1, 2016 and August 8, 2016

Primary SIC Codes: 2493

Division of Air Quality, Winston-Salem Regional Office Regional Office Address: 450 West Hanes Mill Road, Suite 300

Winston-Salem, NC 27105

Permit issued this the XXX day of XXXX, 2016

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- 2.3- Permit Shield for Non-Applicable Requirements

SECTION 3: GENERAL PERMIT CONDITIONS

ATTACHMENT

List of Acronyms

SECTION 1- PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Page	Emission Source	Emission Source Description	Control	Control Device Description				
No.	ID No.		Device ID No.					
	Dryers and associated burners							
6	1611 PSD BACT MACT Subpart	Drum Dryer No. 1 - one rotary drum dryer for drying wet wood strands (61,440 lbs/hour maximum wet wood drying	1611-150	one simple cyclone (168 inches in diameter) in series with				
	DDDD	capacity) including one kerosene /No. 2 fuel oil / natural gas-fired burner (40 million Btu/hour maximum heat input)	3450	one wet electrostatic precipitator (35,354 square feet of collection plate area) in series with				
6	3811 PSD BACT	Suspension Burner No. 1 - one wood / kerosene/No. 2 fuel oil/natural gas-fired/ burner (40 million Btu/hour maximum heat input, 60 million Btu/hour designed capacity)	3460	one regenerative thermal oxidizer (RTO) ²				
6	3311 PSD BACT MACT Subpart DDDD	Wet Cell No. 1 Primary Operating Mode - firing wood/alternative fuel ³ at 25 million Btu per hour maximum heat input and firing kerosene/No. 2 fuel oil/natural gas at 20 million Btu per hour maximum heat input						
		Wet Cell No. 1 <u>Dryer Bypass Mode¹</u> - firing wood/alternative fuel ³ at 25 million Btu per hour maximum heat input and firing kerosene/ No. 2 fuel oil /natural gas at 20 million Btu per hour maximum heat input	3340-100	one multicyclone (25 tubes, nine inches in diameter each)				
6	1621 PSD BACT MACT Subpart	Drum Dryer No. 2 - one rotary drum dryer for drying wet wood strands (61,440 lbs/hour maximum wet wood drying	1621-150	one simple cyclone (168 inches in diameter) in series with				
	DDDD	capacity) including one kerosene /No. 2 fuel oil/natural gas-fired burner (40 million Btu/hour maximum heat input)	3450	one wet electrostatic precipitator (35,354 square feet of collection plate area) in series with				
6	9821 PSD BACT	Suspension Burner No. 2 - one wood/kerosene/No. 2 fuel oil/ natural gas-fired burner (40 million Btu/hour maximum heat input, 60 million Btu/hour designed capacity)	3460	one regenerative thermal oxidizer ²				
6	9321 PSD BACT MACT Subpart DDDD	Wet Cell No. 2 <u>Primary Operating Mode-</u> firing wood/alternative fuel ³ at 25 million Btu per hour maximum heat input and firing kerosene/No. 2 fuel oil/natural gas at 20 million Btu per hour maximum heat input						
		Wet Cell No. 2 <u>Dryer Bypass Mode¹</u> - firing wood/alternative fuel ³ at 25 million Btu per hour maximum heat input and firing kerosene/No. 2 fuel oil/natural gas at 20 million Btu per hour maximum heat input	3340-200	one multicyclone (25 tubes, nine inches in diameter each)				

Page No.	Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
6	PSD BACT MACT Subpart DDDD	Drum Dryer No. 3 - one rotary drum dryer for drying wet wood strands (61,440 lbs/hour maximum permitted wet wood drying capacity) including one kerosene/ No. 2 fuel oil/natural gas-fired burner (40	1632-150 3450	one simple cyclone (168 inches in diameter) in series with one wet electrostatic precipitator (35,354 square feet of collection
6	3831 PSD BACT	million Btu/hour maximum heat input) Suspension Burner No. 3 - one wood/kerosene/No. 2 fuel oil/natural gas- fired burner (40 million Btu/hour maximum heat input, 60 million Btu/hour designed capacity)	3460	plate area) in series with one regenerative thermal oxidizer ²
6	3331 PSD BACT NSPS MACT Subpart	Wet Cell No. 3 <u>Primary Operating Mode</u> - firing wood/kerosene/No. 2 fuel oil/natural gas/ alternative fuel ³ at 25 million Btu/hour maximum heat input		
	DDDD	Wet Cell No. 3 <u>Dryer Bypass Mode¹</u> firing wood/kerosene/No. 2 fuel oil/natural gas/ alternative fuel ³ at 25 million Btu/hour maximum heat input	3340-300	one multicyclone (35 tubes, eight inches in diameter each)
		Oriented Strand Board (O	SB) Press	
22	4301 PSD BACT MACT Subpart DDDD	OSB Press	3470	biofilter ²
		OSB Operations		
27	B2801 PSD BACT	OSB operation consisting of woodroom, conversion, and finishing	2821-401	one simple cyclone (84 inches in diameter)
	MACT Subpart DDDD		2803	one simple cyclone (126 inches in diameter)
			2801	one bagfilter (9,187 square feet of filter area)
27	B2811 PSD BACT	OSB operation consisting of woodroom, conversion, and finishing	2035	one simple cyclone (90 inches in diameter)
	MACT Subpart DDDD		2812	one simple cyclone (114 inches in diameter)
			2814	one simple cyclone (180 inches in diameter)
			2811	one bagfilter (9,187 square feet of filter area)

^{1.} Wet Cells Nos. 1, 2, and 3 (ID No. 3311, 3321, and 3331) run in the Dryer Bypass Mode when the dryers (ID Nos. 1611, 1621, and 1631) are not operating (i.e., for maintenance or SSM).

^{2.} RTO (ID No. 3460) and Biofilter (ID No. 3470) are not subject to PSD BACT requirements.

^{3.} Alternative fuels are defined as post wet water, resinated material, crank case oil, used oil, stencil paint (water-based), ink (mineral oil-based), edgeseal paint (water-based), resin sump water, knife grinding coolant, and nail line ink.

Page	Emission Source	Emission Source Description	Control	Control Device Description
No.	ID No.		Device ID	
27	D2021	OCD analytical and intimated and and	No. 2813	and simulations (00 in sheet in
27	B2831	D BACT conversion, and finishing ACT Subpart	2813	one simple cyclone (90 inches in diameter)
			2821-301	one simple cyclone (84 inches in
	DDDD		2621-301	diameter)
			2832	one simple cyclone (84 inches in
				diameter)
			2831	one bagfilter (2,668 square feet of
				filter area)
27	B2841	one wood sander operation	2842	one simple cyclone (150 inches in
	PSD BACT			diameter)
	MACT Subpart		2841	one bagfilter (4,801 square feet of
27	DDDD B2807	OCD analysis and street of the decision	2804	filter area) one simple cyclone (192 inches in
21	PSD BACT	OSB operation consisting of woodroom, conversion, and finishing	2804	diameter)
	MACT Subpart	conversion, and miniming		dianeter)
	DDDD		2807	one bagfilter (6,040 square feet of
				filter area)
27	B2627	OSB operation consisting of woodroom,	2617	one simple cyclone (180 inches in
	PSD BACT	conversion, and finishing		diameter)
	MACT Subpart		2627	one bagfilter (7,864 square feet of
	DDDD	F : 10		filter area)
	T 7000 100	Engines and Genera		27/4
32	5000-100 PSD BACT	one diesel/kerosene-fired fire water pump	N/A	N/A
	MACT Subpart	engine, (340 horsepower)		
	ZZZZ			
32	4763-100	one diesel/kerosene fired standby	N/A	N/A
	PSD BACT	generator engine (760 horsepower)		
	MACT Subpart			
	ZZZZ			
32	TOSEG	Thermal Oil System Emergency	N/A	N/A
	MACT Subpart ZZZZ	Generator (Diesel Fuel-fired, 299 BHP)		
	LLLL	Dehawking Units		
38	1414	Debarking Units Debarking	N/A	N/A
36	1414	Log Yard	11///	IV/A
38	1100-100	Logs stored in log yard	N/A	N/A
30	1100 100	Waste Water Treatment		17/41
48	3-WP	3 Wastewater Ponds	N/A	N/A
48	13-SA	13 Spray Areas	N/A	N/A
48	3-SA	3 Spray Areas	N/A	N/A
	1	1 F J		["

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

2.1 Emission Source(s) and Control Devices(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, record keeping, and reporting requirements as specified herein:

A. Dryers and associated Burners:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
1611	Drum Dryer No. 1 including one kerosene /No. 2 fuel oil / natural gas-fired burner	1611-150	one simple cyclone in series with
3811	Suspension Burner No. 1 - Wood/Kerosene/No. 2 fuel oil/natural gas-fired	3450	one wet electrostatic precipitator
3311	Wet Cell No. 1 <u>Primary Operating Mode</u> - Wood/Natural Gas/ No. 2 fuel oil/ Kerosene/ Alternative fuel-fired	3460	in series with one regenerative thermal oxidizer
3311	Wet Cell No. 1 <u>Dryer Bypass Mode</u> - Wood/ Natural Gas/ No. 2 fuel oil/ Kerosene/Alternative fuel-fired	3340-100	one multicyclone
1621	Drum Dryer No. 2 including one kerosene /No. 2 fuel oil / natural gas-fired burner	1621-150	one simple cyclone in series with
3821	Suspension Burner No. 2 - Wood/Kerosene/No. 2 fuel oil/natural gas-fired	3450	one wet electrostatic precipitator
3321	Wet Cell No. 2 <u>Primary Operating Mode</u> - Wood/Natural Gas/ No. 2 fuel oil/ Kerosene/Alternative fuel-fired	3460	in series with one regenerative thermal oxidizer
3321	Wet Cell No. 2 <u>Dryer Bypass Mode</u> - Wood/ Natural Gas/ No. 2 fuel oil/ Kerosene/Alternative fuel-fired	3340-200	one multicyclone
1631	Drum Dryer No. 3 including one kerosene /No. 2 fuel oil / natural gas-fired burner	1632-150	one simple cyclone in series with
3831	Suspension Burner No. 3 - Wood/Kerosene/No. 2 fuel oil/natural gas-fired	3450	one wet electrostatic precipitator
3331	Wet Cell No. 3 <u>Primary Operating Mode</u> – Wood/Natural Gas/ No. 2 fuel oil/Kerosene/Alternative fuel-fired	3460	in series with one regenerative thermal oxidizer
3331	Wet Cell No. 3 <u>Dryer Bypass Mode</u> - Wood/ Natural Gas/ No. 2 fuel oil/ Kerosene/Alternative fuel-fired	3340-300	one multicyclone

^{1.} Wet Cells Nos. 1, 2, and 3 (ID No. 3311, 3321, and 3331) run in the Dryer Bypass Mode when the dryers (ID Nos. 1611, 1621, and 1631) are not operating (i.e., for maintenance or SSM).

The following table provides a summary of limits and/or standards for the emission units described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
1 onutant	*AOS - firing natural gas, No. 2 fuel oil, kerosene and/or alternative fuels only	
Particulate Matter	Allowable emission rate = 0.37 pounds per million Btu heat input	15A NCAC 02D .0503 (c)
	Affected emission units: Wet Cells Nos. 1, 2, and 3 (ID Nos. 3311, 3321, and 3331)	
	*POS - firing wood only and/or alternative fuels and/or natural gas/kerosene/No. 2 fuel oil	
	E = [(0.45)(Qw) + (0.37)(Qo)] $(Qw + Qo)$	
Particulate Matter	Where: E = allowable emission rate in pounds per million Btu heat input Qw = actual wood or wood products heat input rate in Btu/hr Qo = actual oil and/or alternative fuels heat input rate in Btu/hr	15A NCAC 02D .0504 (c) and (f)
	Affected emission units: Wet Cells Nos. 1, 2, and 3 (ID Nos. 3311, 3321, and 3331)	
	$E = 4.10 \text{ x P}^{0.67}$ for units with process weight rate less than 30 tons per hour	
	E=55.0(P) ^{0.11} - 40 for units with process weight rates greater than 30 tons per hour	
Particulate Matter	Where: E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 02D .0515
	Affected emission units: Drum Dryers Nos. 1, 2, and 3 (ID Nos. 1611, 1621, and 1631) Suspension Burners Nos. 1, 2, and 3 (ID Nos. 3811, 3821, and 3831)	
	2.3 pounds per million Btu heat input	
Sulfur Dioxide	Affected emission units: Drum Dryers Nos. 1, 2, and 3 (ID Nos. 1611, 1621, and 1631) Suspension Burners Nos. 1, 2, and 3 (ID Nos. 3811, 3821, and 3831) Wet Cell No. 1 (ID No. 3311) and Wet Cell No. 2 (ID No. 3321) Regenerative Thermal Oxidizer (ID No. 3460)	15A NCAC 02D .0516
Visible Emissions	20 percent opacity	15A NCAC 02D .0521(d)
Sulfur Dioxide	0.5 lbs per million Btu heat input or sulfur in fuel limit of 0.5 weight percent sulfur Affected emission units:	15A NCAC 02D .0524 (NSPS Subpart Dc)
	Wet Cell No. 3 (ID No. 3331)	
Carbon Monoxide	498.3 lbs/hr, daily divided by operating hours per day averaging period (before RTO control emission rate)	15A NCAC 02D .0530
Nitrogen Oxides	33.44 lbs/hr, 12-month rolling averaging period (before RTO control emission rate)	15A NCAC 02D .0530

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate Matter	40.3 lbs/hr, 24-hour averaging period (before RTO control emission rate) Affected emission units: Drum Dryers Nos. 1, 2, and 3 (ID Nos. 1611, 1621, and 1631) Suspension Burners Nos. 1, 2, and 3 (ID Nos. 3811, 3821, and 3831) Wet Cells Nos. 1, 2, and 3 (ID Nos. 3311, 3321, and 3331) in Primary Operating Mode	15A NCAC 02D .0530
Particulate Matter	Wood combustion emission rate: 11.17 lbs/hr each, 24-hour averaging period Oil combustion emission rate: 7.38 lbs/hr (Wet Cells No. 1 and 2), 24-hour averaging period 9.23 lbs/hr (Wet Cell No. 3), 24-hour averaging period Affected emission units: Wet Cells Nos. 1, 2, and 3 (ID Nos. 3311, 3321, and 3331) in Dryer Bypass Mode	15A NCAC 02D .0530
Visible Emissions	20% opacity	15A NCAC 02D .0530
Volatile Organic Compounds	514.6 lbs/hr as Carbon, 12-month rolling averaging period (before RTO control emission rate)	15A NCAC 02D .0530
Multiple pollutants	Recordkeeping and reporting of actual emissions (Application No. 8600108.11A) Affected emission Units: Drum Dryer No. 3 (ID No. 1631)	15A NCAC 02D .0530(u)
PM/PM ₁₀	Compliance Assurance Monitoring	15A NCAC 02D. 0614 (40 CFR 64)
Volatile Organic Compounds	456.69 tons per consecutive twelve-month period	15A NCAC 02Q .0317 (PSD Avoidance)
None	Contemporaneous records of changing from one alternate operating scenario to another	15A NCAC 02Q .0508(j)
Sulfur Dioxide	See Section 2.2 A.1	15A NCAC 02Q .0317 (PSD Avoidance)
Hazardous Air Pollutants	See Section 2.2 B.1	15A NCAC 02D .1111 (40 CFR 63, Subpart DDDD)
Odors	State-enforceable only Odorous emissions must be controlled. See Section 2.2 C.3	15A NCAC 02D .1806

^{*}POS - Primary Operating Scenario, AOS - Alternative Operating Scenario. The Permittee, contemporaneously with making a change from one alternate operating scenario to another, shall record in a logbook (written or electronic format) the scenario under which it is operating.

[15A NCAC 02Q .0508(j)]

AOS - firing natural gas, No. 2 fuel oil, kerosene and/or alternative fuels only in wet cells (ID Nos. 3311, 3321, and 3331)

1. 15A NCAC 02D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

a. Emissions of particulate matter from the combustion of natural gas, kerosene, No. 2 fuel oil or alternative fuels that are discharged from the following sources into the atmosphere shall not exceed an allowable emission rate of 0.37 pounds per million Btu heat

Table 2.1 A.1.a.

Emission Source ID No.	Emission Source Description
3311	Wet Cell No. 1
3321	Wet Cell No. 2
3331	Wet Cell No. 3

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test exceed the limit given in Section 2.1 A.1.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

c. No monitoring, record keeping, and reporting are required for the firing of natural gas, No. 2 fuel oil, kerosene or alternative fuels in these sources.

POS - firing wood only and/or alternative fuels and/or natural gas/kerosene/No. 2 fuel oil in wet cells (ID Nos. 3311, 3321, and 3331)

2. 15A NCAC 02D .0504: PARTICULATES FROM WOODBURNING INDIRECT HEAT EXCHANGERS

a. Emissions of particulate matter from the combustion of wood or wood products alone or in combination with alternative fuels and/or natural gas and/or No. 2 fuel oil and/or kerosene that are discharged from the following sources into the atmosphere shall not exceed an allowable emission rate as calculated by the following equation:

$$E = \frac{[(0.45)(Qw) + (0.37)(Qo)]}{(Qw + Qo)}$$

where: E = allowable emission rate in pounds per million Btu heat input

Qw = actual wood or wood products heat input rate in Btu/hr

Qo = actual natural gas, kerosene, No. 2 fuel oil or alternative fuels heat input rate in Btu/hr

Table 2.1 A.2.a.

Emission Source ID No.	Emission Source Description
3311	Wet Cell No. 1
3321	Wet Cell No. 2
3331	Wet Cell No. 3

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.2.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

c. The Permittee shall follow the applicable monitoring, recordkeeping, and reporting requirements in Sections 2.1 A.7.k through s. If the required monitoring and recordkeeping are not met as given in Section 2.1 A.7.k through q, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.

3. 15A NCAC 02D .0515: PARTICULATE EMISSIONS FROM MISCELLANEOUS INDUSTRIAL PROCESSES

a. Emissions of particulate matter from the sources in Table 2.1 A.3.a. shall not exceed an allowable emission rate as calculated by the following equations:

 $E = 4.10 \text{ x P}^{0.67}$ for units with process weight rate less than 30 tons per hour

or

E=55.0(P)^{0.11}- 40 for units with process weight rates greater than 30 tons per hour

where:

E = allowable emission rate in pounds per hour calculated to three significant figures

P = process weight rate in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight. However, solid fuels charged to the suspension burners and wet cells are considered part of the process rate.

Table 2.1 A.3.a.

Emission Source ID No.	Emission Source Description
1611	Drum Dryer No. 1
1621	Drum Dryer No. 2
1631	Drum Dryer No. 3
3811	Suspension Burner No. 1
3821	Suspension Burner No. 2
3831	Suspension Burner No. 3

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of the test performed exceed the limits given in Section 2.1 A.3.a. above, for particulate matter, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

c. The Permittee shall follow the applicable monitoring, recordkeeping, and reporting requirements in Sections 2.1 A.7.k, l, and o through s. If the required monitoring and recordkeeping are not met as given in Sections 2.1 A.7. k, l, and o through q., the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

4. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

a. Emissions of sulfur dioxide from the following sources shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

Table 2.1 A.4.a.

Emission Source ID No.	Emission Source Description	
1611	Drum Dryer No. 1	
1621	Drum Dryer No. 2	
1631	Drum Dryer No. 3	
3811	Suspension Burner No. 1	
3821	Suspension Burner No. 2	
3831	Suspension Burner No. 3	
3311	Wet Cell No. 1	
3321	Wet Cell No. 2	
3460	Regenerative Thermal Oxidizer	

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.4.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

c. No monitoring, record keeping, and reporting are required while firing these fuels.

5. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Table 2.1 A.5.a.

Emission Source	Emission Point	
	ID No.	
Drum Dryer No. 1 (ID No. 1611)	3460-750	
Drum Dryer No. 2 (ID No. 1621)	3450-500	
Drum Dryer No. 3 (ID No. 1631)		
Suspension Burner No. 1 (ID No. 3811)		
Suspension Burner No. 2 (ID No. 3821)		
Suspension Burner No. 3 (ID No. 3831)		
Wet Cell No. 1 (ID No. 3311)		
Wet Cell No. 2 (ID No. 3321)		
Wet Cell No. 3 (ID No. 3331)		
Dryer Bypass Mode		
Wet Cell No. 1 (ID No. 3311)	3319-100	
Wet Cell No. 2 (ID No. 3321)	3329-100	
Wet Cell No. 3 (ID No. 3331)	3340-000	

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of these tests exceed the limits given in Section 2.1 A.5.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

c The Permittee shall follow the applicable monitoring, recordkeeping, and reporting requirements in Sections 2.1 A.7.u through w below. If the required monitoring and recordkeeping are not met as given in Sections 2.1 A.7.u and v. below, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

6. 15A NCAC 02D .0524: NEW SOURCE PERFORMANCE STANDARDS

a. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS)," for as promulgated in 40 CFR Part 60 Subpart Dc, "Small Industrial-Commercial-Institutional Steam Generating Units," including Subpart A, "General Provisions," for the following source:

Table 2.1 A.6.a.

Emission Source ID No.	Emission Source Description
3331	Wet Cell No. 3

Emission Limitations [15A NCAC 02Q .0508(f), 02D .0524]

b. Pursuant to 40 CFR 60.42c(d), the Permittee shall not combust oil (including kerosene) in these sources that contains greater than 0.5 weight percent sulfur. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if the oil combusted in these sources contains greater than 0.5 weight percent sulfur.

Testing [15A NCAC 02Q .0508(f)]

c. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 A.6.b. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f), 40 CFR 60.48c(e)]

- d. Pursuant to 40 CFR 60.42c(h)(1), compliance with the oil sulfur limits in Section 2.1 A.6.b may be determined based on a certification from the fuel supplier, as described under 40 CFR 60.48c(f).
- e. Pursuant to 40 CFR 60.48c(e), the Permittee shall keep records, including the following information:
 - i. Calendar dates covered in the reporting period.
 - ii. Fuel supplier certifications.
- f. Pursuant to 40 CFR 60.48c(f), the fuel supplier certifications for distillate oil shall include the following information:
 - i. The name of the oil supplier;
 - ii. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and
 - iii. The sulfur content or maximum sulfur content of the oil.
- g. Pursuant to 40 CFR 60.48c(g), the Permittee shall maintain records of the amount of each fuel combusted during each calendar month.
- h. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if the monitoring and recordkeeping requirements in Sections 2.1 A.6.d. through g are not met.

Reporting [15A NCAC 02Q .0508(f)]

- i. Pursuant to 40 CFR 60.48c, the Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified. The summary report shall contain the following information:
 - i. Calendar dates covered in the reporting period.
 - ii. Fuel supplier certifications including the following information.
 - (A) The name of the oil supplier;
 - (B) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and
 - (C) The sulfur content or maximum sulfur content of the oil.
 - iii. A certified statement signed by the Permittee of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted (distillate fuel) during the reporting period.

7. 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

a. For PSD purposes, the following "Best Available Control Technology" (BACT) emission rates shall not be exceeded:

Sour	ce	Pollutants	Emission Limits
Drum Dryer No. 1 Drum Dryer No. 2	(ID No. 1611) (ID No. 1621)	PM/PM ₁₀ (filterable only)	40.3 lbs/hr, 24-hour averaging period*
Drum Dryer No. 3 Suspension Burner No. 1 Suspension Burner No. 2 Suspension Burner No. 3 Wet Cell No. 1 Wet Cell No. 2 Wet Cell No. 3 Dryer Bypass Mode Wet Cell No. 1 Wet Cell No. 1 Wet Cell No. 3	(ID No. 1631) (ID No. 3811) (ID No. 3821) (ID No. 3831) (ID No. 3311) (ID No. 3331) (ID No. 3331) (ID No. 3331)	Volatile Organic Compounds Visible emissions Carbon Monoxide Nitrogen Oxides PM/PM ₁₀ (filterable only)	514.6 lbs/hr as C, 12-month rolling averaging period* 20 percent opacity 498.3 lbs/hr, daily divided by operating hours per day averaging period* 33.44 lbs/hr, 12-month rolling averaging period* 11.17 lbs/hr each, 24-hour averaging period (Note: Wood combustion emission rate) 7.38 lbs/hr (Wet Cell No. 1), 24-hour averaging
		Visible emissions	period 9.23 lbs/hr (Wet Cell No. 3), 24-hour averaging period (Note: Oil combustion emission rate) 20 percent opacity
Dryer Bypass Mode		PM/PM ₁₀	11.17 lbs/hr, 24-hour averaging period
Wet Cell No. 2	(ID No. 3321)	(filterable only)	(Note: Wood combustion emission rate) 7.38 lbs/hr, 24-hour averaging period (Note: Oil combustion emission rate)
		Visible emissions	20 percent opacity

^{*} Note: Before RTO Control Emissions Rate

For Emissions of Carbon Monoxide, Nitrogen Oxides, and Volatile Organic Compounds

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing for carbon monoxide, nitrogen dioxides, and volatile organic compounds shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1. A.7.a., above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, the Permittee shall establish an inspection and maintenance schedule/checklist and perform such inspections and maintenance on Drum Dryer Burners Nos. 1, 2, and 3 (ID Nos. 1611, 1621 and 1631), Suspension Burners Nos. 1, 2, and 3 (ID Nos. 3811, 3821, and 3831), and the Wet Cells Nos. 1, 2, and 3 (ID Nos. 3311, 3321, and 3331). As a minimum, the inspection and maintenance program will include once per calendar month inspection of the burners, fans, and duct work for leaks and to ensure structural integrity. In addition, the Permittee shall perform maintenance and cleaning at least once per year. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the burners are not inspected, cleaned, and maintained.
- d. The results of inspection and maintenance for the Drum Dryer Burners Nos. 1, 2, and 3 (**ID Nos. 1611, 1621 and 1631**), Suspension Burners Nos. 1, 2, and 3 (**ID Nos. 3811, 3821, and 3831**), and the Wet Cells Nos. 1, 2, and 3 (**ID Nos. 3311, 3321, and 3331**) shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the burners, fans, and duct work; and
 - iv. any corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the Drum Dryer Burners Nos. 1, 2, and 3 (**ID Nos. 1611, 1621 and 1631**), Suspension Burners Nos. 1, 2, and 3 (**ID Nos. 3811, 3821, and 3831**), and the Wet Cells Nos. 1, 2, and 3 (**ID Nos. 3311, 3321, and 3331**) within 30 days of a written request by the DAQ.
- f. The Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

For Emissions of Particulate Matter

Testing [15A NCAC 02Q .0508(f)]

- g. If emissions testing is required, the testing for particulate matter shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1. A.7.a., above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.
- h. Under the provisions of NCGS 143-215.108, on November 5, 2008, the Permittee demonstrated compliance with the emission limits above by testing (after the WESP) the combined Drum Dryers Nos. 1, 2, and 3 (**ID Nos. 1611, 1621, and 1631**), the Suspension Burners Nos. 1, 2, and 3 (**ID Nos. 3811, 3821, and 3831**), and the Wet Cells Nos. 1, 2, and 3 (**ID Nos. 3311, 3321, and 3331**) when burning wood for particulate matter in accordance with a testing protocol approved by the DAQ. The Permittee shall repeat the testing by November 5, 2018 or after 7,000 hours of emissions exiting the WESP stack since the November 5, 2008 test, whichever occurs first. Testing for particulate matter shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1 A.7.a, above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.
- i. Under the provisions of NCGS 143-215.108, the Permittee demonstrated compliance with the emission limits above by testing Wet Cells Nos. 2 and 3 (**ID Nos. 3321 and 3331**) while operating in the Dryer Bypass Mode on April 19 and 20, 2016 when burning wood for particulate matter in accordance with a testing protocol approved by the DAQ. The Permittee shall repeat the demonstration by April 19, 2021 and every 5 years thereafter, by testing two of the Wet Cells Nos. 1 or 2 and 3 (**ID Nos. 3311 or 3321 and 3331**) while operating in the Dryer Bypass Mode when burning wood for particulate matter in accordance with a testing protocol approved by the DAQ. Testing for particulate matter shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1 A.7.a, above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

j. Particulate matter emissions shall be controlled as follows:

Primary Operating Mode

- Emissions from the following units shall be combined and controlled by a simple cyclone (ID No. 1611-150) in series with a wet electrostatic precipitator (ID No. 3450).
 - (A) Drum Dryer No. 1 (ID No. 1611)
 - (B) Suspension Burner No. 1 (ID No. 3811)
 - (C) Wet Cell No. 1 (**ID No. 3311**)
- ii. Emissions from the following units shall be combined and controlled by a simple cyclone (**ID No. 1621-150**) in series with a wet electrostatic precipitator (**ID No. 3450**).
 - (A) Drum Dryer No. 2 (ID No. 1621)
 - (B) Suspension Burner No. 2 (ID No. 3821)
 - (C) Wet Cell No. 2 (**ID No. 3321**)
- iii. Emissions from the following units shall be combined and controlled by a simple cyclone (**ID No. 1632-150**) in series with a wet electrostatic precipitator (**ID No. 3450**).
 - (A) Drum Dryer No. 3 (ID No. 1631)
 - (B) Suspension Burner No. 3 (ID No. 3831)
 - (C) Wet Cell No. 3 (**ID No. 3331**)

Dryer Bypass Mode

- iv. During times when dryers are not operational the particulate emissions from the Wet Cells shall be controlled as follows:
 - (A) Particulate emissions from Wet Cell No. 1 (**ID No. 3311**) shall be controlled by a multicyclone (**ID No. 3340-100**).

- (B) Particulate emissions from Wet Cell No. 2 (**ID No. 3321**) shall be controlled by a multicyclone (**ID No. 3340-200**).
- (C) Particulate emissions from Wet Cell No. 3 (ID No. 3331) shall be controlled by a multicyclone (ID No. 3340-300).

Cyclones (ID Nos. 1611-150, 1621-150, and 1632-150):

- k. To ensure compliance and effective operation, the Permittee shall perform inspections and maintenance of the cyclones. The Permittee shall conduct external visual inspection of the cyclones, the system duct work, and the material collection unit for leaks once per calendar month. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the cyclones and duct work are not inspected and maintained.
- The results of inspection and maintenance for the cyclones shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the cyclones and duct work; and any corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Multicyclones (ID Nos. 3340-100, 3340-200, and 3340-300)

- m. To ensure compliance and effective operation, the Permittee shall perform inspections and maintenance, which shall include the following:
 - i. a monthly (once per calendar month) external visual inspection of the multicyclones, the system duct work, and the material collection unit for leaks and
 - ii. an annual (once per calendar year) internal inspection of the multicyclone's structural integrity.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the multicyclones and duct work are not inspected and maintained.

- n. The results of inspection and maintenance of the multicyclones shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the multicyclones and duct work; and any corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Wet electrostatic precipitator (ID No. 3450):

- o. To ensure compliance and effective operation of the wet electrostatic precipitator (**ID No. 3450**), the Permittee shall perform inspections and maintenance, which shall include the following:
 - i. a monthly (once per calendar month) external visual inspection of critical components of the wet electrostatic precipitator such as voltmeters, quench inlet temperature gauges, outlet temperature gauges, nozzles, pumps, and piping;
 - ii. a monthly (once per calendar month) check for any equipment that does not generate an alarm in the turned-off state, to ensure it is switched on;
 - iii. a monthly (once per calendar month) check for signs of plugging and buildup;
 - iv. a monthly (once per calendar month) external visual inspection of the system ductwork and material collection unit for leaks and corrosion; and
 - v. a record of the total hours of operations when emissions exit the WESP stack shall be maintained to ensure testing is completed within the prescribed 7,000 hours of operation (or 10 years whichever occurs first).

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the wet electrostatic precipitator and ductwork are not inspected and maintained.

- p. To ensure compliance and the effective operation of the wet electrostatic precipitator (**ID No. 3450**), the Permittee
 - continuously monitor and electronically record the voltage and the current in the operating fields. These records shall be maintained on-site and made available to an authorized representative upon request. (A 2% monitor downtime shall be acceptable);
 - ii. maintain the following minimum 24-hour block averages, excluding periods of start-up, shutdown, and malfunction:
 - (A) Minimum Voltage = 31 kilovolts (kV)
 - (B) Minimum Current = 42 milliamperes (mA); and

iii. inspect the wet electrostatic precipitator (**ID No. 3450**) within the same monitoring period for malfunctions and repair as necessary if voltages are less than the minimum value.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these monitoring requirements are not met

- q. The results of inspection and maintenance activities in Sections 2.1 A.7.0 and p shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative of DAQ upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - the causes for any voltage readings that are less than the minimum value voltage for the wet electrostatic precipitator; and corrective actions taken.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- r. The Permittee shall submit the results of any maintenance performed on any control device within 30 days of a written request by the DAQ.
- s. The Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

For Visible Emissions

Testing [15A NCAC 02Q .0508(f)]

t. If emissions testing is required, the testing shall be performed in accordance with and General Condition JJ. If the results of the test performed exceed the limits given in Section 2.1 A.7.a above for visible emissions, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- u. To ensure compliance, the Permittee shall observe, on a daily basis, the emission points for the drum dryers and wet cells for any visible emissions above normal. The daily observation must be made for each day of the calendar year period to ensure compliance with this requirement. The Permittee shall be allowed three (3) days of absent observations per semiannual period. If the emission source(s) is not operating, a record of this fact along with the corresponding date and time shall substitute for the daily observation. If visible emissions from the emission points are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.7.a., above.

If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0530.

- v. The results of the monitoring for visible emissions shall be maintained in a logbook (written or electronic format) onsite and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting which stack(s) was observed and those sources with emissions that were observed to be above normal or in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

w. The Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

8. 15A NCAC 02D .0530(u): USE OF PROJECTED ACTUAL EMISSIONS TO AVOID APPLICABILITY OF PREVENTION OF SIGNIFICANT DETERIORATION REQUIREMENTS

a. The Permittee has used projected actual emissions to avoid applicability of prevention of significant deterioration requirements for the project consisting of replacement of Drum Dryer No. 3 (**ID No. 1631**), as fully described in Application No. 8600108.11A. In order to verify the assumptions used in the projected actual emissions calculations, the Permittee shall comply with the record keeping and reporting requirements in Sections 2.1 A.8.b. and c. below.

Recordkeeping [15A NCAC 02Q .0508(f)]

b. The Permittee shall maintain records of actual emissions for PM, PM₁₀, PM_{2.5}, NOx, SO₂, CO, and VOC in tons per year on a calendar year basis for five years following the resumption of regular operations after the replacement of Drum Dryer No. 3 (**ID No. 1631**). Based on the date the Drum Dryer No. 3 resumed regular operations (October 2011), the five years of recordkeeping will be completed in 2016. The Permittee shall make these records available to the Director or the general public pursuant to the requirements in 40 CFR 70.4(b)(3)(viii).

Reporting [15A NCAC 02Q .0508(f)]

c. The Permittee shall submit a report for PM, PM₁₀, PM_{2.5}, NOx, SO₂, CO, and VOC emissions to the Director within 60 days after the end of each calendar year during which the records in Section 2.1 A.8.b. must be generated. The final report for calendar year 2016 shall be postmarked on or before **March 1, 2017**. The report shall contain the items listed in 40 CFR 51.166(r)(6)(v)(a) through (c). The reported actual emissions for each of the five calendar years for PM, PM₁₀, PM_{2.5}, NOx, SO₂, CO, and VOC will be compared to the respective projected actual emissions as included below:

Pollutant	Projected Actual Emissions* Tons per Year
PM	165.67
PM_{10}	159.68
$PM_{2.5}$	153.53
NOx	53.60
SO_2	10.51
СО	557.01
VOC	280.36

^{*} The projected actual emissions are not enforceable limitations. If the reported actual emissions exceed the projected actual emissions, the Permittee shall include in its annual report an explanation as to why actual emissions exceeded the projected actual emissions.

9. 15A NCAC 02D .0614 COMPLIANCE ASSURANCE MONITORING

a. Pursuant to 40 CFR 64 and 15A NCAC 02D .0614, the Permittee shall comply with the conditions below for the Pollutant Specific Emission Unit(s) presented below:

Pollutant Specific Emission Unit	PM Control Device
Drum Dryer No. 1 including one kerosene / No. 2 fuel oil / natural gas-	one simple cyclone (ID No. 1611-150) in series
fired burner (ID No 1611)	with one wet electrostatic precipitator (ID No.
	3450)
Suspension Burner No. 1 - Wood/Kerosene/ No. 2 fuel oil/natural gas-	
fired (ID No 3811)	
Wet Cell No. 1 Primary Operating Mode -Wood/Natural Gas/ No. 2 fuel	
oil/ Kerosene/ Alternative fuel-fired (ID No 3311)	

Pollutant Specific Emission Unit	PM Control Device
Drum Dryer No. 2 including one kerosene / No. 2 fuel oil / natural gas-	one simple cyclone (ID No. 1621-150) in series
fired burner (ID No 1621)	with one wet electrostatic precipitator (ID No. 3450)
Suspension Burner No. 2 - Wood/Kerosene/ No. 2 fuel oil/natural gas-	3430)
fired (ID No 3821)	
Wat Call No. 2 Primary Organia - Canadia - Was d/ Natural Cas/ No. 2	
Wet Cell No. 2 <u>Primary Operating Scenario</u> - Wood/ Natural Gas/ No. 2 fuel oil/ Kerosene/Alternative fuel-fired (ID No 3321)	
Drum Dryer No. 3 including one kerosene / No. 2 fuel oil / natural gas-	one simple cyclone (ID No. 1632-150) in series
fired burner (ID No 1631)	with one wet electrostatic precipitator (ID No.
	3450)
Suspension Burner No. 3 - Wood/Kerosene/ No. 2 fuel oil/natural gas-	
fired (ID No 3831)	
Wet Cell No. 3 Primary Operating Scenario - Wood/ Natural Gas/ No. 2	
fuel oil/ Kerosene/Alternative fuel-fired (ID No 3331)	

Monitoring Approach [15A NCAC 02Q .0508(f), 40 CFR 64.6]

c. The key elements of the monitoring approach for PM/ PM10 and visible emissions, including parameters to be monitored, parameter ranges and performance criteria are presented in the following table.

Monitoring Elements	Indicator No. 1	Indicator No. 2	
Measurement	Continuous voltage readings on each of the three	Continuous current readings on each of the three	
Approach	fields of the WESP.	fields of the WESP.	
[64.6(c)(1)(i), (ii)]			
Indicator Range	An excursion is defined as a voltage reading of	An excursion is defined as a current reading of	
[64.6(c)(2)]	less than 31kV for greater than 60 seconds.	less than 42mA for greater than 60 seconds.	
	Excursions trigger an inspection and corrective	Excursions trigger an inspection and corrective	
	action.	action.	
QIP threshold	The QIP threshold is six excursions in a six-	The QIP threshold is six excursions in a six-	
[64.8]	month reporting period.	month reporting period.	
Data	Readings are made by the integral voltmeter for	Readings are made by the integral ammeter for	
Representativeness	the WESP control system. The minimum accuracy	the WESP control system. The minimum accuracy	
[64.6(c)(1)(iii),	of the voltmeter is $\pm 1kV$.	of the ammeter is ± 1 mA.	
64.3(b)(1)]			
Verification of	Monitoring shall be required upon issuance of Air Quality Permit No. <u>05678T37</u> .		
Operational Status			
[64.3(b)(2)]			
QA/QC Practices	Voltmeter calibration performed once per calendar	Ammeter calibration performed once per calendar	
and Criteria	year.	year.	
[64.3(b)(3)]			
Monitoring	Continuous monitoring and recording.		
frequency			
[64.3(b)(4)]			
Data collection	Non-SSM periods when voltage and current falls below the acceptable ranges for more than 60		
procedure	seconds will be documented. An electronic or written logbook will be kept of all control device		
[64.3(b)(4)]	inspections and corrective actions		

Recordkeeping Requirements [15A NCAC 02Q .0508(f), 40 CFR 64.9]

- d. The Permittee shall maintain records of the following:
 - i. Date and time and results of all monitoring activities;
 - ii. Information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - iii. Maintenance records of the differential pressure gauge; and

iv. Written QIP required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan

Reporting Requirements [15A NCAC 02Q .0508(f), 40 CFR 64.9]

- e. The Permittee shall submit a summary report of all monitoring activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations for the requirements of this permit must be clearly identified. At a minimum, the report shall include the following elements:
 - i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - iii. A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the Permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

10. 15A NCAC 02D .0614 COMPLIANCE ASSURANCE MONITORING

a. Pursuant to 40 CFR 64 and 15A NCAC 02D .0614, the Permittee shall comply with the conditions below for the Pollutant Specific Emission Unit(s) presented below during the <u>Dryer Bypass Mode</u>:

Pollutant Specific Emission Unit	PM Control Device
Wet Cell No. 1 <u>Dryer Bypass Mode</u> - firing wood/alternative fuel at 25	one multicyclone (25 tubes, nine inches in
million Btu per hour maximum heat input and firing kerosene/ No. 2 fuel oil	diameter each) (ID No. 3340-100)
/natural gas at 20 million Btu per hour maximum heat input (ID No. 3311)	
Wet Cell No. 2 <u>Dryer Bypass Mode</u> - firing wood/alternative fuel at 25	one multicyclone (25 tubes, nine inches in
million Btu per hour maximum heat input and firing kerosene/No. 2 fuel	diameter each) (ID No. 3340-200)
oil/natural gas at 20 million Btu per hour maximum heat input (ID No. 3321)	
Wet Cell No. 3 <u>Dryer Bypass Mode</u> -firing wood/kerosene/No. 2 fuel	one multicyclone (35 tubes, eight inches in
oil/natural gas/ alternative fuel at 25 million Btu/hour maximum heat input	diameter each) (ID No. 3340-300)
(ID No. 3331)	

Emission Limitations/Standards

b. The following table presents the regulated pollutants and the associated emission limitations/standards:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter (PM)	See Section 2.1 A.1.	15A NCAC 02D .0503
Particulate matter (PM)	See Section 2.1 A.2.	15A NCAC 02D .0504
PM/PM ₁₀ /Visible emissions	See Section 2.1 A.7.	15A NCAC 02D .0530

Monitoring Approach [15A NCAC 02Q .0508(f), 40 CFR 64.6]

c. The key elements of the monitoring approach for PM/ PM10 and visible emissions, including parameters to be monitored, parameter ranges and performance criteria are presented in the following table.

Monitoring Elements	Indicator
Measurement Approach	Each multicyclone flyash dump airlock will be visually inspected <u>daily</u> during the
[64.6(c)(1)(i), (ii)]	Dryer Bypass Mode to ensure proper operation.
Indicator Range	An excursion is defined as no discharge of flyash from the dump airlock. Excursions
[64.6(c)(2)]	trigger an inspection and corrective action.
QIP threshold	The Permittee shall develop a QIP if the threshold of six excursions in a six-month
[64.8]	reporting period is exceeded.

Monitoring Elements	Indicator
Data Representativeness [64.6(c)(1)(iii), 64.3(b)(1)]	Inspections are being made at each dump airlock.
Verification of Operational Status [64.3(b)(2)]	Monitoring shall be required upon issuance of Air Quality Permit No. <u>05678T37</u> .
QA/QC Practices and Criteria [64.3(b)(3)]	The observer will be familiar with multicyclone operation and maintenance.
Monitoring frequency [64.3(b)(4)]	One observation per multicyclone shall be performed daily during the Dryer Bypass Mode.
Data collection procedure [64.3(b)(4)]	The results of the monitoring action will be recorded, including the date and time.

Recordkeeping Requirements [15A NCAC 02Q .0508(f), 40 CFR 64.9]

- The Permittee shall maintain records of the following:
 - Date and time and results of all monitoring activities;
 - ii. Information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; and
 - iii. Written QIP required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement

Reporting Requirements [15A NCAC 02Q .0508(f), 40 CFR 64.9]

- The Permittee shall submit a summary report of all monitoring activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations for the requirements of this permit must be clearly identified. At a minimum, the report shall include the following elements:
 - Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - iii. A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the Permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

11. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

In order to avoid applicability of 15A NCAC 02D .0530, as requested by the Permittee, the volatile organic compound (VOC) emissions from Drum Dryers Nos. 1, 2, and 3 (ID Nos. 1611, 1621, and 1631), Suspension Burners Nos. 1, 2 and 3 (ID Nos. 3811, 3821, and 3831), and Wet Cells Nos. 1, 2 and 3 (ID Nos. 3311, 3321, and 3331) shall be less than 456.69 tons per consecutive twelve-month period.

Monitoring/Recordkeeping [15A NCAC 02O .0508(f)]

The Permittee shall calculate the VOC emissions on a monthly basis to ensure compliance with Section 2.1 A.11.a. above. Calculations shall be made monthly and recorded in a logbook (written or in electronic format), according to the following formula:

$$E_{VOC} = \frac{(49.17) \times t_{RTO} + (491.7) \times t_{WESP}}{2000}$$

where:

 E_{VOC} = tons of VOC emissions per month

49.17 pounds of VOC per hour calculated by 44 ODT / hour x 11.17 lb VOC / ODT-Furnish x (1-90%)

hours per month when the RTO is not bypassed and RTO temperature is greater than or equal to 1267°F t_{RTO}

(3-hour block average temperatures)

491.7 = pounds of VOC per hour calculated by 44 ODT / hour x 11.17 lb VOC / ODT-Furnish

twesp = hours per month when the RTO is bypassed or hourly periods when the RTO temperature is less than 1267°F (3-hour block average temperatures), including hourly RTO periods of start-up, shutdown, and malfunction)

- i. Upon receipt of an approved test that demonstrates a different operating temperature of the RTO, the Permittee shall attach the approval memorandum containing the revised operating temperature to this permit and maintain the temperature in the associated ranges contained therein.
- ii. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the VOC emissions exceed the limit in Section 2.1 A.11.a above or if these records are not maintained.
- c. To ensure compliance, the Permittee shall:
 - i. establish an inspection and maintenance schedule/checklist that will include an annual inspection of the RTO heating unit and associated inlet/outlet valves to ensure structural integrity;
 - ii. continuously monitor and electronically record the combustion chamber temperatures in the RTO and the state of the bypass valve. These records shall be maintained on-site and made available to an authorized representative upon request. (A two percent monitor downtime shall be acceptable); and
 - iii. calibrate, operate, and maintain the monitoring device using procedures that take into account manufacturer's specifications to ensure quality.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the monitoring and recordkeeping requirements are not met.

- d. The results of the inspection, maintenance, and monitoring for combustion chamber temperatures shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection or observation; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a semiannual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
 - The monthly VOC emissions for the previous 17 months. The emissions must be calculated for each of the 12month periods over the previous 17 months; and
 - ii. All instances of deviations from the requirements of this permit must be clearly identified.

12. 15A NCAC 02Q .0508(j): ALTERNATIVE OPERATING SCENARIOS (for the regulations 15A NCAC 02D .0503 and 15A NCAC 02D .0504)

The Permittee, contemporaneously with making a change from one alternate operating scenario to another for Wet Cells (**ID Nos. 3311, 3321, and 3331**), shall record in a logbook (written or electronic format) the scenario under which it is operating.

B. OSB Press (ID No. 4301) controlled by Biofilter (ID No. 3470)

The following table provides a summary of limits and/or standards for the emission unit described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate Matter	$E = 4.10 \text{ x P}^{0.67}$ Where: $E = \text{allowable emission rate in pounds per hour}$ $P = \text{process weight in tons per hour}$	15A NCAC 02D .0515
Visible Emissions	20 percent opacity	15A NCAC 02D .0521(d)
	For PSD purposes, the following BACT permit limitations shall not be exceeded:	15A NCAC 02D .0530

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate Matter	11.71 lb/hr PM/PM ₁₀ , 24-hour averaging period*	
Volatile Organic Compounds	99.44 lb/hr VOC, 12-month rolling averaging period*	
Visible Emissions	20% opacity*	
	450,000,000 square feet equivalent (3/8 inch basis at 42 pounds per cubic foot) per year	
	*before Biofilter control	
Multiple pollutants	Recordkeeping and reporting of actual emissions (Application No. 8600108.15A)	15A NCAC 02D .0530(u)
Hazardous Air Pollutants	See Section 2.2 B.1	15A NCAC 02D .1111 (40 CFR 63, Subpart DDDD)
Odors	State-enforceable only Odorous emissions must be controlled. See Section 2.2 C.3	15A NCAC 02D .1806

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

a. Emissions of particulate matter from this source shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \text{ x P}^{0.67}$$

Where E = allowable emission rate in pounds per hour

P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.1 a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

c. The Permittee shall follow the monitoring, recordkeeping, and reporting requirements in Sections 2.1 B.3.c through e. below. If the required monitoring and recordkeeping are not met as given in Sections 2.1 B.3.c and d. below, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

a. Visible emissions from the following source shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Table 2.1 B.2.a.

Emission Source	Emission Point ID No.
OSB Press (ID No. 4301)	3350-000

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

c. The Permittee shall follow the monitoring, recordkeeping, and reporting requirements in Sections 2.1 B.3.g. through i. below. If the required monitoring and recordkeeping are not met as given in Sections 2.1 B.3.g and h. below, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

3. 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

a. For PSD purposes, the following "Best Available Control Technology" (BACT) emission rates and Oriented Strand Board production and operation limitations shall not be exceeded:

Source	Pollutants	Emission Limits	Production/Operation Limit
OGD D	PM/PM ₁₀	11.71 lbs/hour, 24-hour averaging period*	Annual press production on the OSB press (ID No. 4301) shall be limited to 450,000,000 square feet equivalent on a 3/8 inch basis at 42 pounds per cubic foot
OSB Press	Visible Emissions	20 percent opacity*	NA
(ID No. 4301)	Volatile Organic Compounds	99.44 lbs/hour, 12-month rolling averaging period*	Annual press production on the OSB press (ID No. 4301) shall be limited to 450,000,000 square feet equivalent on a 3/8 inch basis at 42 pounds per cubic foot

^{*}Before biolfilter control

For Emissions of Particulate Matter and Volatile Organic Compounds

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1 B.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. To ensure compliance with the particulate matter and volatile organic compound emission limitations, the Permittee shall perform inspections and maintenance of the OSB press (ID No. 4301). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the source is not inspected and maintained.
- d. The results of inspection and maintenance for the OSB press (**ID No. 4301**) shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed; and
 - iv. any corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

e. The Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

For Visible Emissions

Testing [15A NCAC 02Q .0508(f)]

f. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of the test performed exceed the limits given in Section 2.1 B.3.a above for visible emissions, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- g. To ensure compliance, the Permittee shall observe, on a once per calendar month basis, the emission point (Stack ID No. 3350-000) for the OSB press (**ID No. 4301**) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year to ensure compliance with this requirement. If visible emissions from the emission point for the OSB press is observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 B.3.a. above.

If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0530.

- h. The results of the monitoring for visible emissions shall be maintained in a logbook (written or electronic format) onsite and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action; and
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be above normal or in noncompliance along with any corrective actions taken to reduce visible emissions.

The Permittee shall be deemed in noncompliance 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

i. The Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

For Production/Operation Limit

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

j. To ensure compliance with the above BACT limit, annual press production for the OSB press (**ID No. 4301**) shall be limited to **450,000,000 square feet equivalent on a 3/8 inch basis at 42 pounds per cubic foot**. The Permittee shall maintain monthly records of the total amount of oriented strand board produced in a logbook (written or in electronic format). The total press production shall be calculated as follows:

$$P_{t} = \sum_{i=1}^{n} P_{ai} \left(\frac{T_{i}}{3/8} \right) \left(\frac{D_{i}}{42} \right)$$

Where:

P_{ai} = actual gross production footage (MMSF) for different thickness/density combinations

 $\begin{array}{lll} T_i & = & \text{actual thickness (inch) for specific production run} \\ D_i & = & \text{actual density (lb/ft}^3) \text{ for specific production run} \\ P_t & = & \text{total normalized production at } 3/8 \text{ inch and } 42 \text{ lb/ft}^3 \end{array}$

Such records shall indicate the amount of oriented strand board produced during the preceding month and the total amount of oriented strand board produced over the preceding twelve-month period. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the oriented strand board production records are not recorded and maintained or the production limit is exceeded.

Reporting [15A NCAC 02Q .0508(f)]

k. The Permittee shall submit a semiannual summary report, acceptable to the Regional Air Quality Supervisor, postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the annual production rate from press operation in square feet equivalent (3/8 inch basis at 42 pounds per cubic foot). The annual production rate must be calculated for each of the 12-month periods over the previous 17 months.

4. 15A NCAC 02D. 0530(u): USE OF PROJECTED ACTUAL EMISSIONS TO AVOID APPLICABILITY OF PREVENTION OF SIGNIFICANT DETERIORATION REQUIREMENTS

a. The Permittee has used projected actual emissions to avoid applicability of prevention of significant deterioration requirements for the project consisting of maintenance on the OSB Press (**ID No. 4301**) as fully described in

Application No. 8600108.15A. In order to verify the assumptions used in the projected actual emissions calculations, the Permittee shall comply with the record keeping and reporting requirements in Sections 2.1 B.4.b. and c. below.

Recordkeeping [15A NCAC 02Q .0508(f)]

b. The Permittee shall maintain records of actual emissions for the pollutants in Table 2.1 B.4.1 in tons per year on a calendar year basis for five years following the resumption of regular operations after the maintenance on the OSB Press (**ID No. 4301**) as fully described in Application No. 8600108.15A. The Permittee shall make the information, documented and maintained in this condition available to the Director or the general public pursuant to the requirements in 40 CFR 70.4(b)(3)(viii).

Reporting [15A NCAC 02Q .0508(f)]

c. The Permittee shall submit a report of the emissions of the pollutants in Table 2.1 B.4.1 to the Director within 60 days after the end of each calendar year during which the records in Section 2.1 B.4.b. must be generated. The report shall contain the items listed in 40 CFR 51.166(r)(6)(v)(a) through (c). The reported actual emissions for each of the five calendar years for the following pollutants will be compared to the respective projected actual emissions as included below:

Table 2.1 B.4.1

Pollutant	Projected Actual Emissions, tpy
CO	601
NO_x	56
PM	233
PM-10	216
PM-2.5	201
SO_2	1.8
VOC	687

Pollutant	Projected Actual Emissions, tpy
Lead	9.97E-03
H_2SO_4	6.95E-04
CO_2	70,348
CH ₄	8.9
N ₂ O	4.3
CO ₂ e	71,853

^{*} The projected actual emissions are not enforceable limitations. If the reported actual emissions exceed the projected actual emissions, the Permittee shall include in its annual report an explanation as to why actual emissions exceeded the projected actual emissions.

C. The following sources

Table 2.1 C.1

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description		
OSB Operation	OSB Operations				
		2821-401	one simple cyclone (84 inches in diameter)		
D2901	B2801 OSB operation consisting of woodroom, conversion, and finishing	2803	one simple cyclone (126 inches in diameter)		
B2801		in series with			
		2801	one bagfilter (9,187 square feet of filter area)		
		2035	one simple cyclone (90 inches in diameter)		
	OSB operation consisting of woodroom, conversion, and finishing	2812	one simple cyclone (114 inches in diameter)		
B2811		2814	one simple cyclone (180 inches in diameter)		
			in series with		
		2811	one bagfilter (9,187 square feet of filter area)		

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
	OSB operation consisting of woodroom, conversion, and finishing	2813	one simple cyclone (90 inches in diameter)
		2821-301	one simple cyclone (84 inches in diameter)
B2831		2832	one simple cyclone (84 inches in diameter)
		in series with	
		2831	one bagfilter (2,668 square feet of filter area)
	one wood sander operation	2842	one simple cyclone (150 inches in diameter)
B2841		in series with	
		2841	one bagfilter (4,801 square feet of filter area)
	OSB operation consisting of	2804	one simple cyclone (192 inches in diameter)
B2807	woodroom, conversion, and finishing	in series with	
		2807	one bagfilter (6,040 square feet of filter area)
	OSB operation consisting of woodroom, conversion, and	2617	one simple cyclone (180 inches in diameter)
B2627		in series with	
	finishing	2627	one bagfilter (7,864 square feet of filter area)

The following table provides a summary of limits and/or standards for the emission units described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate Matter	Adequate duct work and properly designed collectors	15A NCAC 02D .0512
Visible Emissions	20 percent opacity	15A NCAC 02D .0521(d)
Particulate Matter, Visible Emissions	For PSD purposes, the BACT permit limitations in Section 2.1 C.3 shall not be exceeded	15A NCAC 02D .0530
PM/PM ₁₀	Compliance Assurance Monitoring	15A NCAC 02D. 0614 (40 CFR 64)
Hazardous Air Pollutants	See Section 2.2 C.1.	15A NCAC 02D .1111 (40 CFR 63, Subpart DDDD)
Volatile Organic Compounds	Work Practice Standards. See Section 2.2 D.1.	15A NCAC 02D .0958
Odors	State-enforceable only Odorous emissions must be controlled. See Section 2.2 D.3	15A NCAC 02D .1806

1. 15A NCAC 02D .0512: PARTICULATES FROM WOOD PRODUCTS FINISHING PLANTS

a. The Permittee shall not cause, allow, or permit particulate matter caused by the working, sanding, or finishing of wood to be discharged from any stack, vent, or building into the atmosphere without providing, as a minimum for its collection, adequate duct work and properly designed collectors. In no case shall the ambient air quality standards be exceeded beyond the property line.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

b. The Permittee shall follow the monitoring, recordkeeping, and reporting requirements in Sections 2.1 C.3.c. through g. below. If the required monitoring and recordkeeping are not met as given in Section 2.1 C.3.c through e. below, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0512.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of these tests exceed the limits given in Section 2.1 C.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f)]

c. The Permittee shall follow the monitoring, recordkeeping, and reporting requirements in Sections 2.1 C.3.i. through k. below. If the required monitoring and recordkeeping are not met as given in Sections 2.1 C.3.i and j. below, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

3. 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

a. For PSD purposes, the following "Best Available Control Technology" (BACT) emission rates shall not be exceeded:

Emission Source	Emission Point ID No.	Pollutants	Emission Limits
OSB Operation	2801	PM/PM_{10}	0.24 lbs/hour, 24-hour averaging period
(ID No. B2801)	2001	Visible Emissions	20 percent opacity
OSB Operation	2811	PM/PM_{10}	0.347 lbs/hour, 24-hour averaging period
(ID No. B2811)		Visible Emissions	20 percent opacity
OSB Operation	2831	PM/PM_{10}	0.072 lbs/hour, 24-hour averaging period
(ID No. B2831)		Visible Emissions	20 percent opacity
One Wood Sander Operation	2841	PM/PM_{10}	0.138 lbs/hour, 24-hour averaging period
(ID No. B2841)	2841	Visible Emissions	20 percent opacity
OSB Operation		PM/PM_{10}	0.37 lbs/hour, 24-hour averaging period
(ID No. B2807)	2807	Visible Emissions	20 percent opacity
OSB Operation	2627	PM/PM ₁₀	0.212 lbs/hour, 24-hour averaging period
(ID No. B2627)		Visible Emissions	20 percent opacity

For Emissions of Particulate Matter

Testing [15A NCAC 02Q .0508(f)]

b. If testing is required for emissions of particulate matter, the testing shall be performed in accordance with General Condition JJ. If the results of this test exceed the limits given in Section 2.1 C.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions shall be controlled as described in Table 2.1 C.1.
- d. To ensure compliance and effective operation, the Permittee shall perform inspections and maintenance for the cyclones and fabric filters, which shall include the following:
 - i. a monthly external visual inspection of the system ductwork, fabric filters, and cyclones for leaks; and
 - ii. an annual (for each twelve-month period following the initial inspection) internal inspection of the structural integrity of the fabric filters and cyclones.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the fabric filters, cyclones, and duct work are not inspected and maintained.

- e. The results of inspection and maintenance activities shall be maintained in a logbook (written or electronic format) onsite and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed on the cyclones, fabric filters, and duct work; and
 - iv. any corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit the results of any maintenance performed on the cyclones and fabric filters within 30 days of a written request by the DAQ.
- g. The Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

For Visible Emissions

Testing [15A NCAC 02Q .0508(f)]

h. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of the test performed exceed the limits in Section 2.1 C.3.a above for visible emissions, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- i. To ensure compliance, the Permittee shall observe, on a once per calendar month basis, the emission points for the emission sources for any visible emissions above normal. The monthly observations must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from the emission points for the dust collection systems are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 C.3.a., above.

If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0530.

- j. The results of the monitoring for visible emissions shall be maintained in a logbook (written or electronic format) onsite and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be
 - iii. above normal or in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iv. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

k. The Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

4. 15A NCAC 02D .0614 COMPLIANCE ASSURANCE MONITORING

a. Pursuant to 40 CFR 64 and 15A NCAC 02D .0614, the Permittee shall comply with the conditions below for the Pollutant Specific Emission Unit(s) presented in Table 2.1 C.1

Emission Limitations/Standards

b. The following table presents the regulated pollutants and the associated emission limitations/standards:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter (PM)	See Section 2.1 C.1.	15A NCAC 02D .0512
PM/PM ₁₀ /Visible emissions	See Section 2.1 C.3.	15A NCAC 02D .0530

Monitoring Approach [15A NCAC 02Q .0508(f), 40 CFR 64.6]

c. The key elements of the monitoring approach for PM/ PM10 and visible emissions, including parameters to be monitored, parameter ranges and performance criteria are presented in the following table.

Monitoring Elements	Indicator	
Measurement Approach	Visible emissions from each bagfilter outlet will be monitored <u>daily</u> using a reference	
[64.6(c)(1)(i), (ii)]	method 22-like procedures.	
Indicator Range	An excursion is defined as the presence of visible emissions. Excursions trigger an	
[64.6(c)(2)]	inspection and corrective action.	
QIP threshold	The Permittee shall develop a QIP if the threshold of six excursions in a six-month	
[64.8]	reporting period is exceeded.	

Monitoring Elements	Indicator
Data Representativeness [64.6(c)(1)(iii), 64.3(b)(1)]	Observations are being made at the emission points (bagfilter outlet).
Verification of Operational Status [64.3(b)(2)]	Monitoring shall be required upon issuance of Air Quality Permit No. <u>05678T37</u> .
QA/QC Practices and Criteria [64.3(b)(3)]	The observer will be familiar with Method 22 and the follow Method 22-like procedures.
Monitoring frequency [64.3(b)(4)]	One Method 22-like observation per bagfilter outlet shall be performed daily.
Data collection procedure [64.3(b)(4)]	The results of the monitoring action will be recorded, including the date and time.

Recordkeeping Requirements [15A NCAC 02Q .0508(f), 40 CFR 64.9]

- d. The Permittee shall maintain records of the following:
 - i. Date and time and results of all monitoring activities;
 - ii. Information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; and
 - iii. Written QIP required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan

Reporting Requirements [15A NCAC 02Q .0508(f), 40 CFR 64.9]

- e. The Permittee shall submit a summary report of all monitoring activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations for the requirements of this permit must be clearly identified. At a minimum, the report shall include the following elements:
 - i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - iii. A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the Permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

D. The following sources:

Emission Source ID No.	Emission Source Description	
TOSEG	Thermal Oil System Emergency Generator (Diesel Fuel-fired, 299 BHP)	
5000-100	One diesel/kerosene-fired fire water pump engine, (340 horsepower)	
4763-100	One diesel/kerosene fired standby generator engine (760 horsepower)	

The following table provides a summary of limits and/or standards for the emission units described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Sulfur Dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516(a)
Visible Emissions	20 percent opacity	15A NCAC 02D .0521(d)

Regulated Pollutant	Limits/Standards	Applicable Regulation	
Particulate Matter	Fire Water Pump Engine (ID No. 5000-100): 0.5 pounds PM/PM ₁₀ per hour, 24-hour averaging period		
Carbon Dioxide	1.6 pounds CO per hour, daily divided by operating hours per day averaging period		
Volatile Organic Compounds	0.6 pounds VOC per hour, 12-month rolling averaging period	15A NCAC 02D .0530	
Visible Emissions	20 percent opacity		
	500 hours per year of operation		
	Standby Generator (ID No. 4763-100): 4,330 hours per year of operation		
	Standby Generator (ID No. 4763-100) Subject to the rule but no applicable requirements		
Hazardous Air Pollutants	Fire Water Pump Engine (ID No. 5000-100) and Thermal Oil System Emergency Generator (ID No. TOSEG)	15A NCAC 02D .1111 (40 CFR 63 Subpart ZZZZ)	
Sulfur Dioxide	Ongoing work practice requirements See Section 2.2 A.1	15A NCAC 02Q .0317 (PSD Avoidance)	

1. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

a. Emissions of sulfur dioxide from these sources shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard.

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.1.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

Monitoring/Record Keeping/Reporting [15A NCAC 02Q .0508(f)]

c. No monitoring, record keeping, and reporting are required for sulfur dioxide emissions from these sources.

2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of these tests exceed the limits given in Section 2.1 D.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring/Record Keeping/Reporting [15A NCAC 02Q .0508(f)]

c. No monitoring, record keeping, and reporting is required for visible emissions from the combustion of kerosene/diesel fuel from these sources.

3. 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION

a. For PSD purposes, the following "Best Available Control Technology" (BACT) emission rates and operation limitations shall not be exceeded:

Emission Source	Pollutants	Emission Limits	Production/Operation Limit	
	PM/PM ₁₀ 0.5 lbs/hour, 24-hour averaging period		500 hours per consecutive twelve- month period	
Fire Water Pump Engine (ID No. 5000-100)	Carbon monoxide	1.6 lbs/hour, daily divided by operating hours per day averaging period	500 hours per consecutive twelve- month period	
	Volatile organic compounds	0.6 lbs/hour, 12-month rolling averaging period	500 hours per consecutive twelve- month period	
	Visible emissions	20 percent opacity	NA	
Standby Generator (ID No. 4763-100)	N/A	N/A	4,330 hours per consecutive twelve- month period	

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of the test performed exceed the limits given in Section 2.1 D.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

For Carbon Monoxide, Particulate Matter, Volatile Organic Compounds, and Operating Limit

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

c. To ensure compliance, the Permittee shall record the operating hours for the fire water pump engine (**ID No. 5000-100**) and the standby generator (**ID No. 4763-100**) by recording the monthly hours of operation for each unit in a logbook (written or electronic format). Such logbook shall be made available to an authorized representative of the DAQ upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the operating hours are not recorded and/or the operating hours exceed the limits in Section 2.1 D.3.a above.

Reporting [15A NCAC 02Q .0508(f)]

d. The Permittee shall submit a semiannual summary report, acceptable to the Regional Air Quality Supervisor, of postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the monthly operating hours for the fire water pump engine (ID No. 5000-100) and the standby generator (ID No. 4763-100). The operating hours must be calculated for each of the 12-month periods over the previous 17 months.

For Visible Emissions

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- e. To ensure compliance, once a month if the unit is operated during the calendar month, the Permittee shall observe the emission points for the fire water pump engine (**ID No. 5000-100**) for any visible emissions above normal. If visible emissions from this source are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 D.3.a. above.

If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

- f. The results of the monitoring for visible emissions shall be maintained in a logbook (written or electronic format) onsite and made available to an authorized representative upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be above normal or in noncompliance along with any corrective actions taken to reduce visible emissions; and

iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

g. The Permittee shall submit a summary report of monitoring and record keeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

4. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

Applicability [40 CFR 63.6585, 63.6590]

a. For this engine (**ID No. 4763-100**), (existing stationary RICE with a site rating of greater than 500 brake HP located at a major source of HAP emissions), the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart ZZZZ "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" and Subpart A "General Provisions."

Definitions and Nomenclature

b. For the purposes of this permit condition, the definitions and nomenclature contained in 40 CFR 63.6675 shall apply.

Stationary RICE subject to limited requirements

c. Pursuant to 40 CFR 63.6590(b)(3)(iii), this source does not have to meet the requirements of 40 CFR Part 63 Subpart ZZZZ and Subpart A, including the initial notification requirements.

5. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

Applicability [40 CFR 63.6585, 63.6590(a)(1)(ii)]

a. For these engines (ID Nos. 5000-100 and TOSEG) (existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions), the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart ZZZZ "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" and Subpart A "General Provisions."

Definitions and Nomenclature

b. For the purposes of this permit condition, the definitions and nomenclature contained in 40 CFR 63.6675 shall apply.

Applicability Date [40 CFR 63.6595(a)(1)]

c. The Permittee shall comply with the applicable emission limitations, operating limitations, and other requirements no later than May 3, 2013.

Notifications [40 CFR 63.6645(a)(5)]

d. The Permittee has no notification requirements.

General Provisions [40 CFR 63.6665]

e. The Permittee shall comply with the General Provisions as applicable pursuant to Table 8 of 40 CFR Part 63 Subpart ZZZZ. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these requirements are not met.

Operating and Maintenance Requirements [15A NCAC 02Q .0508(b)]

- f. During periods of startup of the IC engine, the Permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. [40 CFR 63.6602 and 63.6625(h)]
- g. Except during periods of startup of the IC engine, the Permittee shall:
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first;

- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
 and
- iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6602, Table 2C]

- h. The Permittee shall have the option to utilize the oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement in Section 2.1 D.5.g. above. [40 CFR 63.6602, Table 2C, 63.6625(i)]
- i. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Section 2.1 D.5.g. above, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable. [40 CFR 63.6602, Table 2C]
- j. The permittee shall be in compliance with the emission limitations, operating limitations and other requirements in this subpart that apply at all times. [40 CFR 63.6605(a)]
- k. The Permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]
- 1. The Permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e) and 63.6640(a), Table 6]
- m. In order for the engine to be considered an emergency stationary RICE under this condition, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (i) through (iii) below, is prohibited.
 - i. There is no time limit on the use of emergency stationary RICE in emergency situations.
 - ii. The Permittee may operate the emergency stationary RICE for any combination of the purposes specified in paragraph (A) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (iii) below counts as part of the 100 hours per calendar year allowed by this paragraph.
 - (A) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
 - iii. Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in Section 2.1 D.5.m.ii. of this section. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 CFR 63.6640(f)]

n. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Section 2.1 D.5.f through m are not met.

Monitoring [15A NCAC 02Q .0508(f)]

o. The Permittee shall install a non-resettable hour meter on the IC engine if one is not already installed. [40 CFR 63.6625(f)] The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if this requirement is not met.

Recordkeeping [15A NCAC 02Q .0508(f)]

- p. The Permittee shall keep the following:
 - i. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).[40 CFR 63.6655(a)(1)]
 - ii. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [40 CFR 63.6655(a)(2)]
 - iii. Records of all required maintenance performed on the air pollution control and monitoring equipment. [40 CFR 63.6655(a)(4)]
 - iv. Records of actions taken during periods of malfunction to minimize emissions in accordance with Section 2.1 D.5.k., including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.6655(a)(5)]
 - v. Records of the maintenance conducted on the RICE pursuant to Section 2.1 D.5.l. [40 CFR 63.6655(d) and (e)]
 - vi. Records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

[40 CFR 63.6655(f)]

- q. The Permittee shall keep each record in a form suitable and readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). [40 CFR 63.6660(a), (b), (c)]
- r. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Section 2.1 D.5.p and q are not met.

Reporting [15A NCAC 02Q .0508(f)]

- s. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of noncompliance must be clearly identified. The summary report shall also include any reporting required under Section 2.1 D.5.i., as necessary. [40 CFR 63.6602, Table 2C, 40 CFR 63.6640(b), (e), and 63.6650(f)]
- t. The Permittee shall be deemed in noncompliance with the reporting requirements of 15A NCAC 02D .1111 if the requirements in Section 2.1 D.5.s are not met.

E. The following sources:

Emission Source ID No.	Emission Source Description	
Debarking Units		
1414	Debarking	
Log Yard		
1100-100	Logs stored in log yard	

The following table provides a summary of limits and/or standards for the emission units described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation	
Visible Emissions	20 percent opacity	15A NCAC 02D .0521(d)	

1. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity.

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1.E.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Monitoring [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a month, the Permittee shall observe the fugitive emissions from the debarking unit (ID No. 1414) and the log yard (ID No. 1100-100) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from the debarking units or the log yard are observed to be above normal, the Permittee shall either:
 - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1.E.1.a above.

If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

Recordkeeping [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring for visible emissions shall be maintained in a logbook (written or electronic format) onsite and made available to an authorized representative of DAQ upon request. The logbook shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be above normal or in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2.2Multiple Emission Source(s) Specific Limitations and Conditions

A. Sources Subject to PSD Avoidance Condition for SO₂

Table 2.2 A.

Emission Source ID No.	Emission Source Description	
1611	Drum Dryer No. 1	
1621	Drum Dryer No. 2	
1631	Drum Dryer No. 3	
3811	Suspension Burner No. 1	
3821	Suspension Burner No. 2	
3831	Suspension Burner No. 3	
3311	Wet Cell No. 1	
3321	Wet Cell No. 2	
3331	Wet Cell No. 3	
5000-100	Firewater Pump	
4763-100	Standby Generator	

1. 15A NCAC 02Q. 0317: AVOIDANCE CONDITIONS for 15A NCAC 02D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION

a. To comply with this Permit and to avoid applicability of 15A NCAC 02D .0530, "Prevention of Significant Deterioration," as requested by the Permittee, sulfur dioxide emissions from the sources in Table 2.2 A shall be less than 40 tons per consecutive twelve (12) month period.

Testing [15A NCAC 02Q .0508(f)]

b. If emissions testing is required, the Permittee shall perform such testing in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.2 A.1.a., the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

Monitoring/Recordkeeping [15A NCAC 02O .0508(f)]

- c. The maximum sulfur content of any Diesel fuel, No. 2 fuel oil, or kerosene received and fired in the sources in Table 2.2 A shall not exceed 0.05 weight percent sulfur.
- d. The maximum number of gallons of Diesel fuel, No. 2 fuel oil, and/or kerosene fired in any consecutive twelve-month period shall not exceed 7.5 million gallons.
- e. To ensure compliance, the Permittee shall monitor the sulfur content of the Diesel oil, No. 2 fuel oil, and kerosene by using fuel oil supplier certification. Fuel oil supplier certifications shall be kept on file and include the following information:
 - i. the name of the fuel oil supplier;
 - ii. a statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60.41c; and
 - iii. a certified statement signed by the responsible official that the records of fuel oil supplier certification submitted represent all of the fuel oil fired during the period.
- f. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the following are not met:
 - i. the sulfur dioxide emissions from the sources in Table 2.2 A exceed 40 tons per any consecutive twelve (12) month period;
 - ii. the sulfur content of the fuel oil/kerosene fired exceeds 0.05 weight percent sulfur; or
 - iii. the amount of fuel oil/kerosene fired in any consecutive twelve-month period exceeds 7.5 million gallons.
- g. The Permittee shall calculate the SO₂ emissions on a monthly basis to ensure compliance with Section 2.2 A.1.a. above. Calculations shall be made monthly and recorded in a logbook (written or in electronic format), according to the following formula:

$$E_{SO2} = \frac{142 \, S(Q_{fo})}{2000}$$

Where:

 E_{SO2} = SO_2 emissions in tons 142 = pounds of sulfur dioxide

S = maximum percent by weight fuel sulfur content

Q_{fo} = total gallons of fuel oil/kerosene fired per month/1,000 gallons

2000 = conversion factor of 2000 pounds per ton

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

- h. The Permittee shall record and maintain records of:
 - i. the amounts of fuel oil/kerosene fired during each month; and
 - ii. fuel supplier certifications.

The record of the amounts of fuel fired during each month shall be made available to an authorized representative of DAQ upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

Reporting [15A NCAC 02Q .0508(f)]

- i. The Permittee shall submit a semiannual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
 - i. the monthly sulfur dioxide emissions for the previous 17 months. The emissions must be calculated for each of the 12-month periods over the previous 17 months.
 - ii. The monthly quantities of fuel oil/kerosene consumed for the previous 17 months; and
 - iii. The maximum sulfur content of the fuel oil/kerosene fired in the previous 6-month period.

B. Sources Subject to Plywood Composite Wood Products MACT

1. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

Applicability [40 CFR 63.2231]

a. For the emission sources subject to "MACT Subpart DDDD" as indicated in the permitted equipment list, the Permittee shall comply with all applicable provisions, including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart DDDD, "National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products," including Subpart A, "General Provisions."

Definitions and Nomenclature [40 CFR 63.2292]

b. For the purposes of this permit condition, the definitions and nomenclature contained in 40 CFR 63.2292 shall apply.

40 CFR Part 63 Subpart A General Provisions [40 CFR 63.2290]

c. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A. "General Provisions," according to the applicability of Subpart A to such sources, as identified in Table 10 to 40 CFR Part 63, Subpart DDDD.

Operating Requirements [15A NCAC 02Q .0508(f)]

d. The Permittee shall comply with <u>ONE</u> of the compliance options in Table 2.2 B.1.d. by using the emissions control systems as shown in Table 2.2 B.1.d, EXCEPT as allowed under Section 2.2 B.1.e. [40 CFR 63.2240(b)]

Table 2.	,∠ В	ı.a.
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Emission Source ID No.	Process Unit Description	Control Device ID No.	Control Device Description	Compliance Options
1611	Drum Dryer No. 1			
1621	Drum Dryer No. 2			Reduce emissions of total HAP,
1631	Drum Dryer No. 3			measured as THC (as carbon) a, by 90
3811	Suspension Burner No. 1			percent; or
3821	Suspension Burner No. 2	3460	regenerative thermal oxidizer	Padvas methonal amissions by 00
3831	Suspension Burner No. 3		ulerillar Oxidizer	Reduce methanol emissions by 90 percent; or
3311	Wet Cell No. 1			percent, or
3321	Wet Cell No. 2			Reduce formaldehyde emissions by 90
3331	Wet Cell No. 3			percent
4301	OSB Press	3470	biofilter	

^{*} The Permittee may choose to subtract methane from THC as carbon measurements

- e. The Permittee shall be in compliance with the compliance options, operating requirements, and the work practice requirements in 40 CFR Part 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in 40 CFR 63.2251. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown, and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. [40 CFR 63.2250(a)]
 - i. The Permittee shall always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). [40 CFR 63.2250(b)]
 - ii. The emission limitations in d. do not apply during times when control device maintenance covered under the approved routine control device maintenance exemption (per request letter dated August 13, 2008) is performed. The Permittee shall minimize emissions to the greatest extent possible during these routine control device maintenance periods. [40 CFR 63.2251(d)]
 - iii. To the extent practical, startup and shutdown of emission control systems must be scheduled during times when process equipment is also shut down. [40 CFR 63.2251(e)]

- f. Operation of the process units controlled as described in Table 2.2 B.1.d during periods of routine control device maintenance as requested in the letters dated August 13, 2008 and April 25, 2012 must not exceed:
 - 3 percent of annual operating uptime for each process unit controlled by the regenerative thermal oxidizer (ID No. 3460).
 - ii. 0.5 percent of annual operating uptime for the OSB Press (**ID No. 4301**) controlled by the biofilter (**ID No. 3470**). [40 CFR 63.2251(b)]
- g. The Permittee shall operate the OSB Press (**ID No. 4301**) in an enclosure that meets the definition of a wood products enclosure in 40 CFR 63.2292. [40 CFR 63.2240(b)]
- h. The Permittee shall develop a written Startup, Shutdown, and Malfunction Plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3). [40 CFR 63.2250(c)]
- i. The Permittee shall use non-HAP coatings (as defined 40 CFR 63.2292) in its Group 1 miscellaneous coating operations.
- j. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the operating requirements in Sections 2.2 B.1.d. through i. are not met.

Affected Sources Not Subject to Operating Requirements [40 CFR 63.2252]

k. For process units not subject to the operating requirements in Sections 2.2 B.1.d through h., the Permittee is not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this 40 CFR Part 63 Subpart DDDD, or any other requirements in 40 CFR Part 63 Subpart A except for the initial notification requirements in 40 CFR 63.9(b).

Testing [15A NCAC 02Q .0508(f)]

- 1. If emissions testing is required, the testing shall be performed in accordance General Condition JJ. If the results of this test are above the limit given in Section 2.2 B.1.d above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.
- m. For the OSB Press (**ID No. 4301**), the Permittee shall conduct a repeat performance test using the applicable method(s) specified in Table 4 to 40 CFR Part 63 Subpart DDDD two (2) years following the previous performance test and within 180 days after each replacement of any portion of the biofilter bed media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media. [Table 7, 40 CFR Part 63 Subpart DDDD] If the results of this test(s) are above the limits given in Section 2.2 B.1.d. above or are not conducted, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111

Monitoring Requirements [15A NCAC 02Q .0508(f)]

- n. The Permittee shall maintain the 3-hour block average RTO firebox temperature equal to or above <u>1267°F</u>. Upon receipt of an approved test that demonstrates a different operating temperature of the RTO, the Permittee shall attach the approval memorandum containing the revised operating temperature to this permit and maintain the temperature in the associated ranges contained therein.
 - [40 CFR 63.2240(b)]
- o. The Permittee shall maintain the 24-hour block biofilter within the following range:
 - i. minimum Biofilter bed temperature: 60.9 °F
 - ii. maximum Biofilter bed temperature: 93.1 °F
 - iii. Upon receipt of an approved test that demonstrates different minimum and/or maximum biofilter bed temperatures, the Permittee shall attach the approval memorandum containing the revised operating temperatures parameters to this permit and maintain the temperatures in the associated ranges contained therein.

[40 CFR 63.2240(b)]

- p. For the temperature monitoring systems (CPMS) for the RTO (**ID No. 3460**) and the Biofilter (**ID No. 3470**), the Permittee shall meet the following requirements:
 - i. The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing, and recording) for each successive 15-minute period.
 - ii. At all times, maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - iii. Record the results of each inspection, calibration, and validation check
 - iv. Locate the temperature sensor in a position that provides a representative temperature.
 - v. Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.
 - vi. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.
 - vii. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the Permittee shall conduct a temperature sensor validation check in

- which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading.
- viii. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- ix. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.
 - [40 CFR 63.2269(a)(1) through (3) and (b)(1) through (6)]
- q. The Permittee shall monitor and record the RTO (**ID No. 3460**) firebox temperature and the Biofilter (**ID No. 3470**) bed temperature at all times that the process units are operating, except for, as appropriate, monitor malfunctions, associated repairs, required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). [40 CFR 63.2270(b)]
- r. For purposes of calculating data averages, the Permittee shall not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The Permittee shall use all the data collected during all other periods in assessing compliance. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations constitute an instance of noncompliance with the monitoring requirements. [40 CFR 63.2270(b)]
- s. The Permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown, and malfunction; or data recorded during periods of control device downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement, if applicable. The Permittee shall use all the data collected during all other periods in assessing the operation of the control system. [40 CFR 63.2270(c)]
- t. For the RTO (**ID No. 3460**), the Permittee shall determine the 3-hour block average of all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described in Sections 2.2 B.1.r and s). [40 CFR 63.2270(d)]
- 1. For the biofilter (**ID No. 3470**), the Permittee shall determine the 24-hour block average of all recorded readings, calculated after every 24 hours of operation as the average of the evenly spaced recorded readings in the previous 24 operating hours (excluding periods described in Sections 2.2 B.1.r and s). [40 CFR 63.2270(e)]
- v. To calculate the data averages for each 3-hour or 24-hour averaging period, the Permittee shall have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (i.e., not from periods described in Sections 2.2 B.1.r and s). [40 CFR 63.2270(f)]
- w. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the monitoring requirements in Sections 2.2 B.1.n through v. are not met.

Recordkeeping Requirements [15A NCAC 02Q .0508(f), 40 CFR 63.2282 and .2283]

- x. The Permittee shall keep the following:
 - A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status, according to the requirements in 40 CFR 63.10(b)(2)(xiv);
 - ii. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction;
 - iii. Documentation of the approved routine control device maintenance exemption, requested under 40 CFR 63.2251;
 - iv. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii);
 - v. The associated records for Sections 2.2 B.1.n through v and
 - vi. Records showing that non-HAP coatings are being used.
- y. The Permittee shall maintain records in a form suitable and readily available for expeditious review as specified in 40 CFR 63.10(b)(1). [40 CFR 63.2283(a)]
- z. As specified in 40 CFR 63.10(b)(1), the Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.2283(b)]
- aa. The Permittee shall keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The Permittee can keep the records offsite for the remaining 3 years. [40 CFR 63.2283(c)]
- bb. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if records are not maintained per Sections 2.2 B.1.x through aa.

Notification Requirements [40 CFR 63.2280]

- cc. The Permittee shall submit all of the notifications in 40 CFR 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9 (b) through (e), and (g) and (h) by the dates specified. [40 CFR 63.2280(a)]
- dd. The Permittee shall notify the EPA Administrator within 30 days before any of the following actions are taken: [40 CFR 63.2280(g)]
 - i. The modification or replacement of the control system for any process unit subject to the compliance options and operating requirements in Section 2.2 B.1.d above.
 - ii. Changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device including:
 - (A) The 3-hour block average firebox temperature on the RTO (ID No. 3460). [40 CFR 63.2262(k)(2)]
 - (B) The Biofilter (**ID No. 3470**) bed temperature operating range. [40 CFR 63.2262(m)(3)]
- ee. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the notification requirements in Sections 2.2 B.1.cc through dd. are not met.

Reporting Requirements [15A NCAC 02Q .0508(f), 40 CFR 63.2281]

- ff. The permittee shall submit a compliance report semiannually postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of noncompliance with the requirements of this permit must be clearly identified. [40 CFR 63.2281(b)(5) and 63.2281(g)]
- gg. The compliance report must contain the information in Sections 2.2 B.1.gg.i through viii below.
 - i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - iii. Date of report and beginning and ending dates of the reporting period.
 - iv. If the Permittee had a startup, shutdown, or malfunction during the reporting period and took actions consistent with the SSMP, the compliance report must include the information specified in §63.10(d)(5)(i).
 - v. A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the information specified in Sections 2.2 B.1.gg.v.(A) through (C) below.
 - (A) The date and time when the control device was shut down and restarted.
 - (B) Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
 - (C) A statement of whether or not the control device maintenance was included in the approved routine control device maintenance exemption developed pursuant to 40 CFR 63.2251. If the control device maintenance was included in the approved routine control device maintenance exemption, then the Permittee shall report the information in Sections 2.2 B.1.gg.v.(C)(1) through (3) below.
 - (1) The total amount of time that each process unit controlled by the control device operated during the semiannual compliance period and during the previous semiannual compliance period.
 - (2) The amount of time that each process unit controlled by the control device operated while the control device was down for maintenance covered under the routine control device maintenance exemption during the semiannual compliance period and during the previous semiannual compliance period.
 - (3) Based on the information recorded under Sections 2.2 B.1.gg.v.(C)(1) and (2) above for each process unit, compute the annual percent of process unit operating uptime during which the control device was offline for routine maintenance using the following equation:

$$RM = \frac{DT_p + DT_c}{PU_p + PU_c}$$

Where:

RM = Annual percentage of process unit uptime during which control device is down for routine control device maintenance;

PU_p= Process unit uptime for the previous semiannual compliance period;

PU_c= Process unit uptime for the current semiannual compliance period;

DT_p= Control device downtime claimed under the routine control device maintenance exemption for the previous semiannual compliance period;

DT_c= Control device downtime claimed under the routine control device maintenance exemption for the current semiannual compliance period.

- vi. The results of any performance tests conducted during the semiannual reporting period.
- vii. If there are no instances of noncompliance with any applicable compliance option or operating requirement, a statement that there were no instances of noncompliance with the compliance options or operating requirements during the reporting period.
- viii. If there were no periods during which the continuous monitoring system (CMS), including CEMS and CPMS, was out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.

[40 CFR 63.2281(c)]

- hh. The compliance report must also include the following information for each instance of noncompliance from a compliance option or operating requirement where the Permittee is using a CMS to comply with the compliance options and operating requirements. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
 - i The date and time that each malfunction started and stopped.
 - ii. The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.
 - iii. The date, time, and duration that each CMS was out-of-control, including the information in §63.8(c)(8).
 - iv. The date and time that each instance of noncompliance started and stopped, and whether each instance of noncompliance occurred during a period of startup, shutdown, or malfunction; during a period of control device maintenance covered in the approved routine control device maintenance exemption; or during another period.
 - v. A summary of the total duration of the instance of noncompliance during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
 - vi. A breakdown of the total duration of the instances of noncompliance during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.
 - vii. A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
 - viii. A brief description of the process units.
 - ix. A brief description of the CMS.
 - x. The date of the latest CMS certification or audit.
 - xi. A description of any changes in CMS, processes, or controls since the last reporting period.

[40 CFR 63.2271, .2281(c) and (e)]

- ii. The compliance report must also contain the following information for each instance of noncompliance with a compliance option or operating requirement and for each instance of noncompliance with the work practice requirements that occurs where the Permittee is not using a CMS to comply with the compliance options, operating requirements, or work practice requirements. This includes periods of startup, shutdown, and malfunction and routine control device maintenance.
 - i. The total operating time of each affected source during the reporting period.
 - ii. Information on the number, duration, and cause of instances of noncompliance (including unknown cause, if applicable), as applicable, and the corrective action taken.

[40 CFR 63.2271, .2281(c) and (d)]

- jj. The permittee shall submit a report if a startup, shutdown, or malfunction during the reporting period occurred that is not consistent with the SSMP. The report must contain the following:
 - i. Actions taken for the event and must be submitted by fax or telephone within 2 working days after starting actions inconsistent with the plan.
 - ii. The information in 40 CFR63.10(d)(5)(ii) and must be submitted by letter within 7 working days after the end of the event unless alternative arrangements have been made with the permitting authority.

[Table 9, 40 CFR Part 63 Subpart DDDD]

kk. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the reporting requirements in Sections 2.2 B.1.gg, through jj. are not met.

C. Facility-wide Emission Sources

The following table provides a summary of limits and standards applicable facility wide:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Volatile Organic Compounds	Work Practice Standards	15A NCAC 02D .0958
Toxic Air Pollutants	State-enforceable only Permit limits for toxic air pollutants shall not be exceeded.	15A NCAC 02D .1100
Odors	State-enforceable only Odorous emissions must be controlled.	15A NCAC 02D .1806
Toxic Air Pollutants	State-enforceable only Toxic air pollutant emissions shall not exceed the 02Q .0711 levels unless ambient standards are not exceeded	15A NCAC 02Q .0711

1. 15A NCAC 02D .0958: WORK PRACTICES FOR SOURCES OF VOLATILE ORGANIC COMPOUNDS

- a. Pursuant to 15A NCAC 02D .0958, for all sources that use volatile organic compounds (VOC) as solvents, carriers, material processing media, or industrial chemical reactants, or in similar uses that mix, blend, or manufacture volatile organic compounds, or emit VOC as a product of chemical reactions; the Permittee shall:
 - i. store all material, including waste material, containing VOC in tanks or in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,
 - ii. clean up spills of VOC as soon as possible following proper safety procedures,
 - iii. store wipe rags containing VOC in closed containers,
 - iv. not clean sponges, fabric, wood, paper products, and other absorbent materials with VOC,
 - v. transfer solvents containing VOC used to clean supply lines and other coating equipment into closable containers and close such containers immediately after each use, or transfer such solvents to closed tanks, or to a treatment facility regulated under section 402 of the Clean Water Act, and
 - vi. clean mixing, blending, and manufacturing vats and containers containing VOC by adding cleaning solvent and close the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be transferred into a closed container, a closed tank or a treatment facility regulated under section 402 of the Clean Water Act.
- b. When cleaning parts with a solvent containing a VOC, the Permittee shall:
 - i. flush parts in the freeboard area,
 - ii. take precautions to reduce the pooling of solvent on and in the parts,
 - iii. tilt or rotate parts to drain solvent and allow a minimum of 15 seconds for drying or until all dripping has stopped, whichever is longer,
 - iv. not fill cleaning machines above the fill line, and
 - v. not agitate solvent to the point of causing splashing.

Monitoring [15A NCAC 02Q .0508(f)]

c. To ensure compliance with Sections 2.2 C.1.a and b above, the Permittee shall, at a minimum, perform a visual inspection once per month of all operations and processes utilizing VOC. The inspections shall be conducted during normal operations. If the required inspections are not conducted the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0958.

Recordkeeping [15A NCAC 02Q .0508(f)]

- d. The results of the inspections shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
 - i the date and time of each inspection; and
 - ii. the results of each inspection noting whether or not noncompliant conditions were observed.

If the required records are not maintained the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0958.

Reporting [15A NCAC 02Q .0508(f)]

e. The Permittee shall submit a summary report of the observations postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the

preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

STATE ENFORCEABLE ONLY

2. 15A NCAC 02D .1100: CONTROL OF TOXIC AIR POLLUTANTS

a. Pursuant to 15A NCAC 02D .1100 and in accordance with the approved applications for air toxic compliance demonstrations, the following permit limits shall not be exceeded:

Emission Source ID No.	Model Description	Pollutant	Emission Rate (lb/averaging period)	Units
I-2900-300	Touch-Up Paint Booth (2901)	Manganese	2.73E-03	lb/day
I-2911-100	Multi-Size (Auto Spray) Edge Seal	Manganese	7.09E-03	lb/day
		Acrolein	1.14E-05	lb/hr
13-SA	12/16 Sproy Aroos	Benzene	1.42E-07	lb/yr
13-3A	13/16 Spray Areas	Formaldehyde	6.52E-06	lb/hr
		Phenol	1.86E-04	lb/hr
3-SA	3/16 Spray Fields	Acrolein	2.62E-06	lb/hr
		Benzene	3.28E-08	lb/yr
		Formaldehyde	1.50E-06	lb/hr
		Phenol	4.30E-05	lb/hr
3-WP	Wastewater Ponds (3)	Acrolein	1.54E-02	lb/hr
		Benzene	1.49E-01	lb/yr
		Formaldehyde	3.64E-05	lb/hr
		Phenol	1.76E-02	lb/hr
I-STAMP	Grade Stamping	Nickel	3.48E-01	lb/day
T 4044 406	DE Grand Total	Formaldehyde	1.86E-06	lb/hr
I-4011-100	PF Storage Tank	Phenol	1.10E-04	lb/hr
	C N.T.	Manganese	2.85E-02	lb/day
	Green Nail Line	Nickel	2.51E-03	lb/day

Monitoring/Recordkeeping/Reporting

b No monitoring, recordkeeping and reporting is required.

STATE ENFORCEABLE ONLY

3. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS

The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions from the facility from causing or contributing to objectionable odors beyond the facility's boundary.

STATE ENFORCEABLE ONLY

4. TOXIC AIR POLLUTANT EMISSIONS LIMITATION REQUIREMENT

- a. Pursuant to 15A NCAC 02Q .0711, for each of the below listed toxic air pollutants (TAPs), the Permittee has made a demonstration that facility-wide actual emissions do not exceed the Toxic Permit Emission Rates (TPERS) listed in 15A NCAC 02Q .0711. The facility shall be operated and maintained in such a manner that emissions of any listed toxic air pollutant(s) from the facility, including fugitive emissions, will not exceed the toxic permit emission rate(s) (TPERs) specified in 15A NCAC 02Q .0711.
- b. A permit to emit any of the below listed TAPs shall be required for this facility if actual emissions from all sources will become greater than the corresponding TPER.
- c. PRIOR to exceeding any of these listed TPERs, the Permittee shall be responsible for obtaining a permit to emit TAPS and for demonstrating compliance with the requirements of 15A NCAC 02D.1100.
- d. In accordance with the approved application, the Permittee shall maintain records of operational information demonstrating that the toxic air pollutant emissions do not exceed the TPER(s) as listed below:

Pollutant	CAS No.	Carcinogens (lb/yr)	Chronic Toxicant (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
Acetaldehyde	75-07-0				6.8
Bis(2-ethylhexyl)phthalate	117-81-7		0.63		
Butadiene, 1,3-	106-99-0	11			
Carbon disulfide	75-15-0		3.9		
Carbon tetrachloride	56-23-5	460			
Chlorobenzene	108-90-7		46		
Chloroform	67-66-3	290			
Chromium VI	-		0.013		
Ethylene dichloride	107-06-2	260			
n-Hexane	110-54-3		23		
Methyl chloroform	71-55-6		250		64
Methyl ethyl ketone	78-93-3		78		22.4
Methyl isobutyl ketone	108-10-1		52		7.6
Methylene chloride	75-09-2	1600		0.39	
Pentachlorophenol	87-86-5		0.063	0.0064	
Styrene	100-42-5			2.7	
Tetrachloroethylene	127-18-4	13000			
Toluene	108-88-3		98		14.4
Trichloroethylene	79-01-6	4000			
Trichlorofluoromethane	75-69-4			140	
Xylene	1330-20-7		57		16.4

2.3Permit Shield for Non-Applicable Requirements

The Permittee is shielded from the following non-applicable requirements [15A NCAC 02Q .0512(a)(1)(B)]:

A. 15A NCAC 02D .1111, Maximum Achievable Control Technology, for "NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters," 40 CFR Part 63 Subpart DDDDD, is not applicable to Wet Cells Nos. 1, 2, and 3 (**ID No. 3311, 3321, and 3331**) when operating in the Dryer Bypass Mode. The DAQ made this determination because Wet Cells Nos. 1, 2, and 3 (**ID No. 3311, 3321, and 3331**) only operate in the Dryer Bypass Mode for a limited amount of time and because the Dryer Bypass Mode is included in the Permittee's SSM plan under the "NESHAP for Plywood and Composite Wood Products," 40 CFR Part 63 Subpart DDDD. [69 Fed. Reg. 45944-46045 (July 30, 2004)]

SECTION 3 - GENERAL CONDITIONS (version 4.0 12/17/15)

This section describes terms and conditions applicable to this Title V facility.

A. General Provisions [NCGS 143-215 and 15A NCAC 02Q .0508(i)(16)]

- 1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 02D and 02Q.
- The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable
 pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any
 unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement
 action by the DAQ.
- 3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
- 4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
- 5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
- 6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

B. **Permit Availability** [15A NCAC 02Q .0507(k) and .0508(i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of Department of Environmental Quality upon request.

C. Severability Clause [15A NCAC 02Q .0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

D. **Submissions** [15A NCAC 02Q .0507(e) and 02Q .0508(i)(16)]

Except as otherwise specified herein, two copies of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance North Carolina Division of Air Quality 1641 Mail Service Center Raleigh, NC 27699-1641

All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).

E. **Duty to Comply** [15A NCAC 02Q .0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. Circumvention - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

G. Permit Modifications

- 1. Administrative Permit Amendments [15A NCAC 02Q .0514]
 - The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 02Q 0514
- Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 02Q .0524 and 02Q .0505]
 The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 02Q.0524 and 02Q .0505.
- 3. Minor Permit Modifications [15A NCAC 02Q .0515]
 - The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 02Q .0515.
- 4. Significant Permit Modifications [15A NCAC 02Q .0516]
 - The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 02Q .0516.
- 5. Reopening for Cause [15A NCAC 02Q .0517]
 - The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 02Q .0517.

H. Changes Not Requiring Permit Modifications

1. Reporting Requirements

Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:

- a. changes in the information submitted in the application;
- b. changes that modify equipment or processes; or
- c. changes in the quantity or quality of materials processed.

If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

- 2. Section 502(b)(10) Changes [15A NCAC 02Q .0523(a)]
 - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
 - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
 - i. the changes are not a modification under Title I of the Federal Clean Air Act;
 - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
 - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
 - iv. the Permittee shall attach the notice to the relevant permit.
 - c. The written notification shall include:
 - i. a description of the change;
 - ii. the date on which the change will occur;
 - iii. any change in emissions; and
 - iv. any permit term or condition that is no longer applicable as a result of the change.
 - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
- 3. Off Permit Changes [15A NCAC 02Q .0523(b)]

The Permittee may make changes in the operation or emissions without revising the permit if:

- a. the change affects only insignificant activities and the activities remain insignificant after the change; or
- b. the change is not covered under any applicable requirement.
- 4. Emissions Trading [15A NCAC 02Q .0523(c)]

To the extent that emissions trading is allowed under 15A NCAC 02D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 02Q .0523(c).

I.A Reporting Requirements for Excess Emissions and Permit Deviations [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)] "Excess Emissions" - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 02D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 02Q .0700. (Note: Definitions of excess emissions under 02D .1110 and 02D .1111 shall apply where defined by rule.)

"Deviations" - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.

Excess Emissions

- 1. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
- 2. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
 - a. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
 - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
 - name and location of the facility;
 - nature and cause of the malfunction or breakdown;
 - time when the malfunction or breakdown is first observed;
 - expected duration; and
 - estimated rate of emissions;
 - ii. notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
 - iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

Permit Deviations

- 3. Pursuant to 15A NCAC 02Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) as follows:
 - a. Notify the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 02D .0535 quarterly. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

I.B Other Requirements under 15A NCAC 02D .0535

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 02D .0535, including 15A NCAC 02D .0535(c) as follows:

- 1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director, that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 02D .0535(c)(1) through (7).
- 2. 15A NCAC 02D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

J. Emergency Provisions [40 CFR 70.6(g)]

The Permittee shall be subject to the following provisions with respect to emergencies:

- An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the
 facility, including acts of God, which situation requires immediate corrective action to restore normal operation, and that
 causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in
 emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by
 improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- 2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in 3. below are met.

- 3. The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that include information as follows:
 - a. an emergency occurred and the Permittee can identify the cause(s) of the emergency;
 - b. the permitted facility was at the time being properly operated;
 - c. during the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the standards or other requirements in the permit; and
 - d. the Permittee submitted notice of the emergency to the DAQ within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
- 4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 5. This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

K. **Permit Renewal** [15A NCAC 02Q .0508(e) and 02Q .0513(b)]

This 15A NCAC 02Q .0500 permit is issued for a fixed term not to exceed five years and shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete 15A NCAC 02Q .0500 renewal application is submitted at least nine months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 02Q .0512(b)(1), this 15A NCAC 02Q .0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under 15A NCAC 02Q .0400 terminates the facility's right to operate unless a complete 15A NCAC 02Q .0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 02Q .0400 requirements. In either of these events, all terms and conditions of these permits shall remain in effect until the renewal permits have been issued or denied.

L. Need to Halt or Reduce Activity Not a Defense [15A NCAC 02Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. Duty to Provide Information (submittal of information) [15A NCAC 02Q .0508(i)(9)]

- 1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
- 2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. **Duty to Supplement** [15A NCAC 02Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 02Q .0508(f) and 02Q .0508 (l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. Compliance Certification [15A NCAC 02Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air and EPCRA Enforcement Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all federally-enforceable terms and conditions in the permit, including emissions limitations, standards, or work practices. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification shall comply with additional

requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

- 1. the identification of each term or condition of the permit that is the basis of the certification;
- 2. the compliance status (with the terms and conditions of the period covered by the certification);
- 3. whether compliance was continuous or intermittent; and
- 4. the method(s) used for determining the compliance status of the source during the certification period.

Q. Certification by Responsible Official [15A NCAC 02Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

R. Permit Shield for Applicable Requirements [15A NCAC 02Q .0512]

- 1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
- 2. A permit shield shall not alter or affect:
 - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
 - the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
 - c. the applicable requirements under Title IV; or
 - d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
- 3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 02Q .0523.
- 4. A permit shield does not extend to minor permit modifications made under 15A NCAC 02Q .0515.

S. <u>Termination, Modification, and Revocation of the Permit</u> [15A NCAC 02Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

- 1. the information contained in the application or presented in support thereof is determined to be incorrect;
- 2. the conditions under which the permit or permit renewal was granted have changed;
- 3. violations of conditions contained in the permit have occurred;
- 4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
- 5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

T. Insignificant Activities [15A NCAC 02Q .0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

U. **Property Rights** [15A NCAC 02Q .0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

V. Inspection and Entry [15A NCAC 02Q .0508(1) and NCGS 143-215.3(a)(2)]

- 1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
 - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
 - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
 - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

W. **Annual Fee Payment** [15A NCAC 02Q .0508(i)(10)]

- 1. The Permittee shall pay all fees in accordance with 15A NCAC 02Q .0200.
- 2. Payment of fees may be by check or money order made payable to the N.C. Department of Environmental Quality. Annual permit fee payments shall refer to the permit number.
- 3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 02Q .0519.

X. Annual Emission Inventory Requirements [15A NCAC 02Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

Y. Confidential Information [15A NCAC 02Q .0107 and 02Q. 0508(i)(9)]

Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 02Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 02Q .0107.

Z. Construction and Operation Permits [15A NCAC 02Q .0100 and .0300]

A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 02Q .0100 and .0300.

AA. Standard Application Form and Required Information [15A NCAC 02Q .0505 and .0507]

The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 02Q .0505 and .0507.

BB. Financial Responsibility and Compliance History [15A NCAC 02Q .0507(d)(4)]

The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.

CC. Refrigerant Requirements (Stratospheric Ozone and Climate Protection) [15A NCAC 02Q .0501(e)]

- If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II
 ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR
 Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the
 work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR
 Part 82 Subpart F.
- 2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
- 3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR \square 82.166. Reports shall be submitted to the EPA or its designee as required.

DD. Prevention of Accidental Releases - Section 112(r) [15A NCAC 02Q .0508(h)]

If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.

EE. <u>Prevention of Accidental Releases General Duty Clause - Section 112(r)(1)</u> – FEDERALLY-ENFORCEABLE ONLY Although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release.

FF. Title IV Allowances [15A NCAC 02Q .0508(i)(1)]

This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.

GG. Air Pollution Emergency Episode [15A NCAC 02D .0300]

Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 02D .0300.

HH. Registration of Air Pollution Sources [15A NCAC 02D .0202]

The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 02D .0202(b).

II. Ambient Air Quality Standards [15A NCAC 02D .0501(c)]

In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 02D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

JJ. General Emissions Testing and Reporting Requirements [15A NCAC 02Q .0508(i)(16)]

Emission compliance testing shall be by the procedures of Section .2600, except as may be otherwise required in Rules .0524, .0912, .1110, .1111, or .1415 of Subchapter 02D. If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow the procedures outlined below:

- 1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
- 2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
- 3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
- 4. Two copies of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
 - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
 - Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
 - ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.
 - iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in this Section if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
 - b. The Director may authorize the Division of Air Quality to conduct independent tests of any source subject to a rule in this Subchapter to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the Division of Air Quality using the appropriate testing procedures described in Section 02D .2600 has precedence over all other tests.

KK. Reopening for Cause [15A NCAC 02Q .0517]

- 1. A permit shall be reopened and revised under the following circumstances:
 - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
 - additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
 - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
 - d. the Director or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 02Q .0513(c).
- 3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 02Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 02Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.
- 4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
- 5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

LL. Reporting Requirements for Non-Operating Equipment [15A NCAC 02Q .0508(i)(16)]

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. During operation the monitoring recordkeeping and reporting requirements as prescribed by the permit shall be implemented within the monitoring period.

MM. Fugitive Dust Control Requirement [15A NCAC 02D .0540] - STATE ENFORCEABLE ONLY

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

NN. Specific Permit Modifications [15A NCAC 02Q.0501 and .0523]

- 1. For modifications made pursuant to 15A NCAC 02Q .0501(c)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
- 2. For modifications made pursuant to 15A NCAC 02Q .0501(d)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
- 3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 02Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (EPA Air Planning Branch, 61 Forsyth Street SW, Atlanta, GA 30303) in writing at least seven days before the change is made. The written notification shall include:
 - a. a description of the change at the facility;
 - b. the date on which the change will occur;
 - c. any change in emissions; and
 - d. any permit term or condition that is no longer applicable as a result of the change.

In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application

for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

OO. Third Party Participation and EPA Review [15A NCAC 02Q .0521, .0522 and .0525(7)]

For permits modifications subject to 45-day review by the federal Environmental Protection Agency (EPA), EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 02Q .0518 begins at the end of the 45-day EPA review period.

ATTACHMENT

List of Acronyms

AOS Alternate Operating Scenario

BACT Best Available Control Technology

Btu British thermal unit CAA Clean Air Act

CAIR Clean Air Interstate Rule
CEM Continuous Emission Monitor
CFR Code of Federal Regulations
DAQ Division of Air Quality

DEQ Department of Environmental Quality
EMC Environmental Management Commission

EPA Environmental Protection Agency

FR Federal Register

GACT Generally Available Control Technology

HAP Hazardous Air Pollutant

MACT Maximum Achievable Control Technology

NAA Non-Attainment Area

NCAC North Carolina Administrative Code NCGS North Carolina General Statutes

NESHAP National Emission Standards for Hazardous Air Pollutants

NOx Nitrogen Oxides

NSPS New Source Performance Standard OAH Office of Administrative Hearings

PM Particulate Matter

PM₁₀ Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less

POS Primary Operating Scenario

PSD Prevention of Significant DeteriorationRACT Reasonably Available Control Technology

SIC Standard Industrial Classification

SIP State Implementation Plan

SO₂ Sulfur Dioxide tpy Tons Per Year

VOC Volatile Organic Compound